

NOTICE OF TRANSFER

STATE OF ALABAMA)
MOBILE COUNTY)

THE AMERICAN NATIONAL BANK & TRUST CO.
OF MOBILE, a national banking association,

Plaintiff,

VS

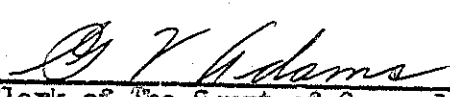
CLARA MAE DUNNAM,

Defendant.

TO: CLARA MAE DUNNAM, the defendant in said Cause:

You are hereby notified that THE AMERICAN NATIONAL BANK & TRUST CO. OF MOBILE, a national banking association, the plaintiff in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, from the General Sessions Court of Mobile County, and having complied with the requirements of the law in such cases made and provided, the same has been granted to the next term of the CIRCUIT COURT of Baldwin County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 14th day of March, 1963.


Clerk of The Court of General Sessions of Mobile County, Civil Division

Case No. 26067

THE AMERICAN NATIONAL BANK &
TRUST CO. OF MOBILE, a national
banking association,

Plaintiff,

VS

CLARA MAE DUNNAM,

Defendant.

NOTICE OF TRANSFER

Returnable to The Circuit Court of
Baldwin County, Alabama

Issued: March 14th, 1963

Serve on: Clara Dunnam
Corner of Thompson & Hall Sts.
Rt. 1, Box 153, Fairhope, Alabama

Received 18 day of March 1963
and on 3rd day of April 1963
I served a copy of the within Transfer
on Clara Mae Dunnam

By service on _____

TAYLOR WILKINS, Sheriff

By Taylor Wilkins D. S.
Hope

RECEIVED

MAR 15 1963

SHERIFF'S OFFICE

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff

BY _____
DEPUTY SHERIFF

CASE NO. _____

COMPLAINT AND SUMMONS

No. 1 A

The State of Alabama, }
MOBILE COUNTY }

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon Clara Mae Dunnam

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile County, on the 4 day of Dec., 19 62 at the hour of 9:30 A. M., then and there to answer a complaint of The American National Bank & Trust Co. of Mobile, a National Banking Association

of a debt or other demand not exceeding Five Hundred Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this 5 day of Nov., 19 62.E. V. Adams
Clerk of the Court of General Sessions of Mobile County.

Cause of Action

COMPLAINT AND SUMMONS

Atty. for Plaintiff: Hamilton, Denniston, Butler & Riddick

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS
OF MOBILE COUNTY

No. 26067

Ret.

Dec. 4, 1962

The American National Bank & Trust
Co. of Mobile, a National Banking Association
VS.

Clara Mae Dunnam
Corner of Thompson & Hall Sts.
Rt. 1, Box 153, Fairhope, Ala.

Continued To

Executed by Service on

Defendant

This _____ day _____, 19_____

Sheriff of Mobile County

By _____

Deputy Sheriff

COMPLAINT AND SUMMONS

Atty. for Plaintiff: Hamilton, Denniston, Butler & Riddick

Atty. for Defendant:

RECEIVED

NOV 5 1962

SHERIFF'S OFFICE

THE COURT OF GENERAL SESSIONS
OF MOBILE COUNTY

No. 26067

Ret.

Dec. 4, 1962

The American National Bank & Trust
Co. of Mobile, a National Banking Association
VS.

Clara Mae Dunnam
Corner of Thompson & Hall Sts.
Rt. 1, Box 153, Fairhope, Ala.

Continued To

Mail Baldwin Co.
Sheriff's claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY

Seibert
DEPUTY SHERIFF

Sheriff's return
Executed by Service on

Clara Mae Dunnam
Defendant

This 13th day Nov, 1962

Taylor Wilkins

Sheriff of Mobile County

By

Fred Seibert
Deputy Sheriff

11/8/62

COMPLAINT AND SUMMONS

Mr. 2

The State of Alabama, }
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon Clara Mae Dunnam

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile
County, on the 1 day of Dec., 19 62 at the hour of 9:30 A. M.,
then and there to answer a complaint of The American National Bank & Trust Co.
of Mobile, a National Banking Association

of a debt or other demand not exceeding Five Hundred Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this 5 day of Nov., 19 62.G. V. Adams
Clerk of the Court of General Sessions of Mobile County.Cause of Action _____

JOHN V. DUCK
ATTORNEY AT LAW
FAIRHOPE, ALABAMA

No. 3

Nov. 16, 1962

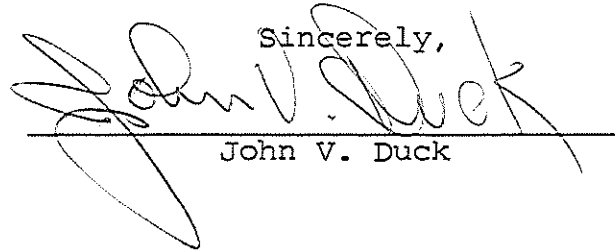
Court of General Sessions
Mobile County Courthouse
Mobile, Alabama

Gentlemen:

Enclosed you will find Plea in Abatement.'

Please serve the copy on Hamilton, Denniston,
Butler and Riddick.

Sincerely,

A handwritten signature in cursive script, reading "John V. Duck", is written over a horizontal line. The signature is fluid and stylized, with the first and last names being more prominent than the middle initial.

John V. Duck

JVD:oq
Encl:

THE AMERICAN NATIONAL BANK
& TRUST COMPANY OF MOBILE,
A National Banking Associa-
tion.

Plaintiff

-VS-

CLARA MAE DUNNAM

Defendant

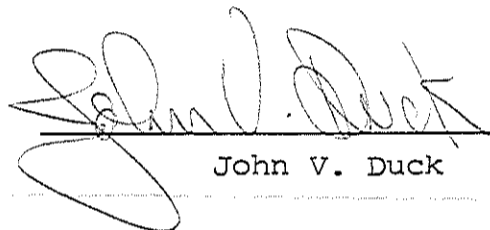
) IN THE COURT OF GENERAL
) SESSIONS, OF MOBILE
) COUNTY, ALABAMA.

) Case No. 26067
)

PLEA IN ABATEMENT

Comes now the Defendant in the above styled cause, by and through her Attorney, and for a Plea to the Bill of Complaint filed herein says:

That the Defendant was at the time this action was brought a resident citizen of Baldwin County, Alabama and still is a resident citizen of Baldwin County, Alabama, and that this Court does not have jurisdiction of this cause and hence should be abated.


John V. Duck

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned authority, personally appeared Mrs. Clara Mae Dunnam, who being by me first duly and legally sworn doth depose and say on oath as follows:

My name is Clara Mae Dunnam.

I am a resident citizen of Baldwin County, Alabama, and have been for more than thirty years, and the matters and facts alleged in the foregoing plea in abatement are true and correct.


Clara Mae Dunnam

Sworn to and subscribed before

me on this the 16th day of November, 1962.

Notary Public

THE AMERICAN NATIONAL BANK & TRUST COMPANY OF MOBILE, A National Banking Association

IN THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY, ALABAMA

Plaintiff

VS.

CASE NO. 26067

CLARA MAE DUNNAM

Defendant

MOTION

Comes now the Plaintiff in the above styled cause by and through its attorney and admits the Plea in Abatement heretofore filed herein and moves this Honorable Court to transfer this case to the appropriate Court in Baldwin County, Alabama, as is provided for in Act No. 76, Special Session 1961, as approved September 15, 1961, and found in Acts of Alabama, 1961, Volume II, Page 1953.

HAMILTON, DENNISTON, BUTLER & RIDDICK

By

1/15

No. 4
(Copy)

THE AMERICAN NATIONAL BANK & TRUST COMPANY OF MOBILE, A
National Banking Association

IN THE COURT OF GENERAL
SESSIONS OF MOBILE COUNTY,
ALABAMA

Plaintiff

VS.

CASE NO. 26067

CLARA MAE DUNNAM

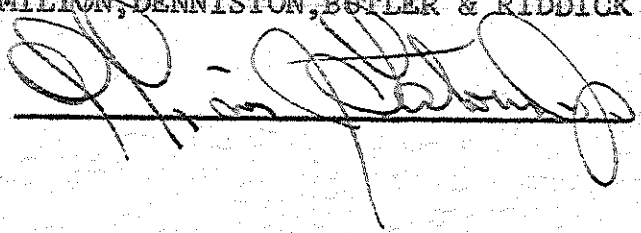
Defendant

MOTION

Comes now the Plaintiff in the above styled cause by and through its attorney and admits the Plea in Abatement heretofore filed herein and moves this Honorable Court to transfer this case to the appropriate Court in Baldwin County, Alabama, as is provided for in Act No. 76, Special Session 1961, as approved September 15, 1961, and found in Acts of Alabama, 1961, Volume II, Page 1953.

HAMILTON, DENNISTON, BUTLER & RIDDICK

By



THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

Case No. 26067

THE AMERICAN NATIONAL BANK & TRUST COMPANY OF MOBILE,	:	Filed:	November 2, 1962
a national banking association,	:	Summons Issued:	November 5, 1962
Plaintiff,	:	Returnable:	December 4, 1962
VS	:	Service Had:	November 13, 1962
	:	Cause of Action:	Complaint and Summons
CLARA MAE DUNNAM,	:	Attorney for Plaintiff:	Hamilton, Denniston, Butler and Kiddick
Defendant.	:	Attorney for Defendant:	John V. Duck, Fairhope, Alabama
Amount of Claim: \$500.00	:		

Plea in Abatement Filed - November 19, 1962

December 28

Motion to Transfer to Baldwin County Filed - January 15, 1963

January 15, 1963 - Motion granted to transfer - W. L. Finch

I hereby certify that the foregoing is a true and correct copy of the above styled cause, as it appears on record and in the files of The Court of General Sessions of Mobile County, Alabama.

Witness my hand this the 14th day of March, 1963.

D. V. Adams

Clerk of The Court of General Sessions of Mobile County



Hamilton, Denniston,
ATTORNEYS FOR PLTF: *Butler & Piddick*

COST BILL

No. 6

THE STATE OF ALABAMA }
MOBILE COUNTY }

The Court of General Sessions
of Mobile County

The American National Bank & Trust Co.
Plaintiff

Chas. Mac Dorman
Defendant

CASE NO. *26067*

COURT FEES

Summons and proceedings thereon to judgment	\$1.00	<i>1.00</i>
Docketing each cause10	<i>.10</i>
Attachment Bond and Affidavit	1.50	
Issuing each Attachment50	
Summoning Garnishee and taking examination75	
Subpoena for each witness15	
Execution and taxing costs thereon50	
Each appeal or certiorari, including bond and certificate of proceedings	1.00	<i>1.00</i>
Every necessary Certificate or Notice not otherwise provided for25	<i>.25</i>
For issuing each Writ of Detinue50	
For each Scire Facias, or notice in the nature thereof50	
Every other Bond50	
Administering an oath and certifying the same25	
Issuing Notice of Appeal25	
Law Library Fee	1.00	<i>1.00</i>
Judgment Ni Si against Garnishee50	
Writ of Discovery50	
Writ of Contempt50	
Writ of Arrest50	
Alias Summons	1.00	
Witness Fee fifty cents for each day's attendance		

TOTAL \$ *3.35*

SHERIFF'S FEES

Levying Attachment	6.00	
Entering and returning same25	
Summoning Garnishee and making return	1.50	
Serving Summons and other mesne process, and returning the same	1.50	<i>1.50</i>
Summoning each Witness and returning Subpoena75	
Collecting execution for costs only	1.50	
Serving Scire Facias or other like notice	1.50	
Serving any summons not herein provided for, and making return	1.50	<i>1.50</i>
Seizing personal property under Writ of Detinue	6.00	
Taking care of such property, such just compensation as Court may fix		
Taking and approving bonds of every kind	2.00	
When property is sold under execution or attachment		
Commission:	5%	
When sale is stayed by restraining order <i>Shirley R. Dandridge</i>	2 1/2%	<i>7.00</i>
Total	\$	<i>10.00</i>
GRAND TOTAL	\$	<i>13.35</i>

I respectfully call your attention to the above Court Cost Bill which if not paid by 19....., it will be my unpleasant duty to issue execution on your property for the recovery of the same.

G. V. ADAMS, Clerk.

NOTICE OF TRANSFER

STATE OF ALABAMA)
MOBILE COUNTY)

THE AMERICAN NATIONAL BANK & TRUST CO.
OF MOBILE, a national banking association,

Plaintiff,

VS

CLARA MAE DUNNAM,

Defendant.

TC: CLARA MAE DUNNAM, the defendant in said Cause:

You are hereby notified that THE AMERICAN NATIONAL BANK & TRUST CO. OF MOBILE, a national banking association, the plaintiff in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, from the General Sessions Court of Mobile County, and having complied with the requirements of the law in such cases made and provided, the same has been granted to the next term of the CIRCUIT COURT of Baldwin County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 14th day of March, 1963.



Clerk of The Court of General Sessions of Mobile County, Civil Division

Case No. 26067

THE AMERICAN NATIONAL BANK &
TRUST CO. OF MOBILE, a national
banking association,

Plaintiff,

VS

CLARA MAE DUNNAM,

Defendant.

NOTICE OF TRANSFER

Returnable to The Circuit Court of
Baldwin County, Alabama

Issued: March 14th, 1963

Serve on: Clara Dunnam
Corner of Thompson & Hall Sts.
Rt. 1, Box 153, Fairhope, Alabama

THE AMERICAN NATIONAL BANK)	IN THE CIRCUIT COURT OF
& TRUST COMPANY OF MOBILE,)	BALDWIN COUNTY, ALABAMA
A NATIONAL Banking Associa-)	
tion.)	AT LAW
)	
Plaintiff)	
-VS-)	CASE NO. <u>5525</u>
)	
CLARA MAE DUNNAM)	
)	
Defendant)	

P L E A S

Comes now the Defendant, Clara Mae Dunnam, and for pleas to the Bill of Complaint filed herein says:

ONE: That the allegations contained in the Bill of Complaint are untrue.

TWO: For further pleas, the Defendant says that the debt sued on has been paid.

Clara Mae Dunnam
Clara Mae Dunnam

Defendant respectfully demands a trial by Jury.

[Signature]
Attorney for Defendant

STATE OF ALABAMA

BALDWIN COUNTY

Personally appeared before me the undersigned authority, Clara Mae Dunnam, and who being by me first duly and legally sworn doth depose and say as follows:

That the matters and facts alledged herein are true and correct.

Clara Mae Dunnam
Clara Mae Dunnam

Sworn to and subscribed before me on this the 19th day of April, 1963.

[Signature]
Notary Public

FILED
APR 22 1963
MUSE J. DUCK, CLERK
REGISTER