

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons MAJOR R. COLEMAN, to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, Alabama, at the place of holding same by ASSOCIATES DISCOUNT CORPORATION, an Alabama corporation, Assignee of J. L. W. SALES & CO.

Witness my hand this the 27 day of October, 1964.

Clerk

COMPLAINT

ASSOCIATES DISCOUNT CORPORATION,
An Alabama corporation, Assignee
of J. W. SALES & CO.,

PLAINTIFF,

VS:

MAJOR R. COLEMAN,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

The Plaintiff claims of the Defendant SEVEN HUNDRED EIGHTY-EIGHT & 00/100 DOLLARS (\$788.00), due on promissory note made by him on the 20th day of May, 1964, and payable on the 1st day of October, 1964, with interest thereon.

Said note provides for attorney's fee of fifteen per cent (15%), which is claimed by the Plaintiff.

Attorney for the Plaintiff

Defendant's address:

Atmore Recapping Shop
Atmore, Alabama

EX-10-28-64

REED

007 22 100

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 08-01-2001 BY 60322
DECLASSIFIED

Mr. 6266

SUMMONS

ASSOCIATES DISCOUNT CORPORATION,
An Alabama corporation, Assignee
of J. W. SALES & CO.,

PLAINTIFF,

VS:

MAJOR R. COLEMAN,

DEFENDANT.

Executed this 28 day
Oct 1944 by serving
a copy of the within.

on Major R. Coleman
H. Ryne
Attorney General

FILED

10-27-44

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

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FOLEY, ALABAMA

ASSOCIATES DISCOUNT CORPORATION,
An Alabama Corporation, Assignee
of J. W. SALES & CO.,

PLAINTIFF

VS

MAJOR R. COLEMAN,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 6266

PLEA IN ABATEMENT

Comes the defendant, Major R. Coleman, in the above-entitled cause, appearing specially and only for the purpose of filing this plea, and says that the said Associates Discount Corporation, An Alabama Corporation, Assignee of J. W. Sales & Co., plaintiff in this cause, ought not to have and maintain its said action for the defendant says separately and severally, as follows, to-wit:

FIRST

That the said defendant is a resident of Escambia County, Alabama, and is not a resident of Baldwin County, Alabama.

SECOND

That the said defendant resides near the City of Atmore, Escambia County, Alabama, in Beat 7, and resided at this address when the alleged promissory note was executed and has continued to reside at said address until the present date.

THIRD

That the said defendant has never resided in Baldwin County, Alabama.

Wherefore, the defendant says that the Circuit Court of Baldwin County, Alabama, is without jurisdiction to try and determine this cause, and that this action should be abated, and prays the judgment of this Honorable Court whether the plaintiff should be allowed to further maintain this suit.

Major R. Coleman
Defendant

THOMPSON & WHITE

BY: Mary Thompson White
Attorneys for Defendant

STATE OF ALABAMA

ESCAMBIA COUNTY

Before me, Irak B. Watson, a Notary

Public, in and for said county, in said State, personally appeared Major R.

Coleman, who being known to me, and by me first duly sworn, deposes and says on oath:

That he is the defendant in the above entitled cause and has personal knowledge of the facts stated in the foregoing pleas and that the said statements of fact therein contained are true.

Major R. Coleman

Sworn to and subscribed before me, this the 13 day of November, 1964.

Irak B. Watson
Notary Public, Escambia County, Alabama.

FILED

NOV 16 1964

ALICE J. DUCK, CLERK
REGISTER