

ASSOCIATES DISCOUNT CORPORATION,  
an Alabama corporation, Assignee  
of Continental Motors, Inc.,

Plaintiff,

VS.

EUGENE EADY,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

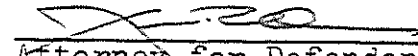
AT LAW

NO. 6308

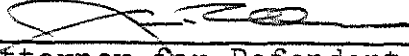
PLEA

Now comes the defendant in the above styled cause and for  
plea to the complaint heretofore filed in said cause says:

1. The allegations of the complaint are untrue.
2. The defendant for answer to the said complaint says  
that he has paid the debt for the recovery of which this suit was  
brought, before the action was commenced.

  
Attorney for Defendant

Defendant demands a trial by  
jury of said cause.

  
Attorney for Defendant

FILED  
DEC 14 1944  
ALICE L. DICK, CLERK  
REGISTER

SUMMONS

STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons EUGENE EADY 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 CONTINENTAL MOTORS, INC.

Witness my hand this the 19 day of November, 1964.

Alice D. Luck  
Clerk

\* \* \* \* \*

COMPLAINT

ASSOCIATES DISCOUNT CORPORATION,  
an Alabama corporation, Assignee  
of CONTINENTAL MOTORS, INC.,

PLAINTIFF,

VS:

EUGENE EADY,

DEFENDANT.

IN THE CIRCUIT COURT OF  
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AT LAW

6308

COUNT I:

Plaintiff claims of the Defendants the sum of, to wit: FIVE HUNDRED & 22/100 DOLLARS (\$500.22) damages, for the breach of a written agreement entered into by the Defendant on, to wit: October 26, 1959, by which they promised to pay to CONTINENTAL MOTORS, INC. the sum of, to wit, ONE HUNDRED EIGHT & 44/100 DOLLARS (\$108.44) each month, commencing on, to wit, December 15, 1959, and continuing on the 15th day of each month thereafter until the sum of, to wit, TWO THOUSAND SIX HUNDRED TWO & 56/100 DOLLARS (\$2,602.56) had been paid for the purchase of an automobile; said written instrument provided that in the event of a default in said payments, the entire amount would then become due, and the Plaintiff could seize said automobile and sell same at a public or private sale, with or without advertisement, with or without notice to the Defendants and apply the proceeds of said sale to the remainder due under the said written instrument, together with all rights thereunder, was assigned to it in writing by the said CONTINENTAL MOTORS, INC., before default in

said written instrument, for which a valuable consideration has been paid.

Plaintiff claims that the Defendant defaulted in said written instrument in that he failed to make the payments provided for therein, leaving a balance of principal due of, to wit: TWO THOUSAND THREE HUNDRED EIGHTY-FIVE & 69/100 DOLLARS (\$2,385.69); that the automobile mentioned therein was seized and sold and that the sum of, to wit, NINETEEN THOUSAND & 00/100 DOLLARS (\$1900.00) was received for the automobile, which sum the Plaintiff alleges was the reasonable market value of the automobile at the time of the seizure and at the time of the sale, and that after applying the amount received from the sale of the said automobile to the balance due under the said written instrument, and allowing all just credits, a balance of, to wit FIVE HUNDRED & 22/100 DOLLARS (\$500.22) remains due and unpaid.

Plaintiff claims of the Defendant the benefit of a waiver of personal property exemptions contained in said written instrument.

Plaintiff claims the additional sum of, to wit; ONE HUNDRED & 00/100 DOLLARS (\$100.00) as a reasonable attorney's fee, averring that, to wit, ONE HUNDRED & 00/100 DOLLARS (\$100.00) is a reasonable attorney's fee as is provided for in said written instrument.



Forest A. Christian, Attorney for  
the Plaintiff

Defendant may be served at:

P. O. Box 195  
Perdido, Alabama

FILED  
NOV 19 1964  
ALICE J. DUCK, CLERK  
REGISTER

84-11-30-64

RECEIVED

NOV 17 1964

TAYLOR WILKINS  
SHERIFF

Received 19 day of Nov 1964  
and on 30 day of Nov 1964  
served a copy of the within Eugene Eady  
by service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By W A Talbert S.

Perolide

Sheriff's return 26 miles at 2.60

Ten Cents per mile

TAYLOR WILKINS

BY Talbert DEPUTY SHERIFF

6308  
SUMMONS

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PLAINTIFF,

VS:

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FILED

NOV 19 1964

ALICE J. DICK, CLERK  
COURT CLERK

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA