ASSOCIATES DISCOUNT CORPORA-	X	
TION, AN ALABAMA CORPORATION,		
ASSIGNEE OF J. W. SALES & COMPANY,	X	
· · · · · · · · · · · · · · · · · · ·	Y	
Plaintiff,	*	IN THE CIRCUIT COURT OF
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٧s.	•	BALDWIN COUNTY, ALABAMA
	X	,
JAMES W. DANIELS,		AT LAW
•	Y	
Defendant.	, ,	CASE NO. 6602
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Comes now James W. Daniels, the Defendant in the above styled cause, for the specific purpose of filing the following Plea to the Complainant's Complaint in said cause, and for no other purpose:

That the said James W. Daniels was at the time said suit was instituted and at the time the said cause of action arose was a bona fide resident of the County of Escambia of the State of Alabama, that he has been a resident of Escambia County, Alabama for 33 years and has never resided in Baldwin County, and that the Circuit Court of Baldwin County is without jurisdiction to try this suit.

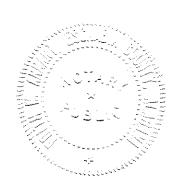
James W. Daniels

STATE OF ALABAMA BALDWIN COUNTY

Before me <u>Gark W. Anant</u>, a Notary Public, in and for said County, in said State, personally appeared James W. Daniels, the Defendant in the above styled cause, who, being by me first duly sworn, says on oath, that the facts set forth in the foregoing plea are true and correct.

James W. Daniels

Sworn to and subscribed before me on this the 17 day of October, 1965. Edisk W. Grant Notary Public





SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons JAMES W. DANIELS, 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. W. SALES & COMPANY.

Witness my hand this the 26 day of Jul7, 1965.

÷ COMPLAINT ASSOCIATES DISCOUNT CORPORATION, X an Alabama corporation, Assignee of J. W. SALES & COMPANY, X IN THE CIRCUIT COURT OF PLAINTIFF, X BALDWIN COUNTY, ALABAMA VS: ĭ AT LAW JAMES W. DANIELS, X 6602 X DEFENDANT.

The Plaintiff claims of the Defendant FIVE HUNDRED TWENTY-FIVE & 00/100 DOLLARS (\$525.00), due on promissory note made by him on the 25th day of January, 1964, and payable on the 1st day of July, 1965, with interest thereon.

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

Forest A. Christian, Attorney for the Plaintiff

Defendant may be served at:

P. O. Box 545 Flomaton, Alabama

FILE WILL 26 1965
AUG & WORK, CLERK REGISTER

FOREST A. CHRISTIAN

ATTORNEY AT LAW
P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

December 28, 1965

Honorable Telfair Mashburn Judge of Circuit Court Bay Minette, Alabama

Re: Associates Discount Corporation

Vs: James W. Daniels

Case No. 6602

Dear Judge:

Please enter a non-suit in this case since the Defendant is a non-resident of this County.

Cordially yours.

ÆGREST A√CHRISTIAN

901.261958

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Executed this 19 Crty serving

Executed this 19 Crty serving

Anno 19 Crty serving

Anno

6602

SUMMONS AND COMPLAINT

ASSOCIATES DISCOUNT CORPORATION, an Alabama corporation, Assignee of J. W. SALES & COMPANY,

PLAINTIFF,

VS:

JAMES W. DANIELS,

DEFENDANT.

AUG L DUNG SESSE

LAW OFFICE OF
FOREST A, CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF FOREST A. CHRISTIAN FOLEY, ALABAMA

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