

ASSOCIATES DISCOUNT CORPORATION,	:	
An Alabama Corporation, Assignee	:	
of TREADWELL FORD, INC.,	:	IN THE CIRCUIT COURT OF
	:	
Plaintiff	:	BALDWIN COUNTY, ALABAMA
	:	
Vs	:	AT LAW
	:	
GEORGE M. CARPENTER,	:	CASE NO. 6604
	:	
Defendant	:	
	:	

PLEA IN ABATEMENT

Comes George M. Carpenter, the Defendant in the above styled cause and files this, his plea in abatement to the above styled cause and shows unto the Court as follows:

That he has never been at any time in his life a resident of Baldwin County, Alabama; that he was born and has lived his entire life in Washington County, Alabama, and that his post office address and place of residence has always been Tibbie, Washington County, Alabama, except for about one and one-half years when his post office address and place of residence was Chatom, Washington County, Alabama. The said Defendant alleges that he is now a bona fide resident citizen of Washington County, Alabama, and is not a resident of Baldwin County, Alabama, and that the promissory note sued on was not executed in Baldwin County, Alabama, but was executed in Mobile County, Alabama.

The said Defendant prays that the said summons and complaint be quashed and the costs in this cause be taxed against the Plaintiff.

Respectfully submitted,
SCOTT & PORTER, Attorneys

By: Howard Scott
Howard Scott

STATE OF ALABAMA,
WASHINGTON COUNTY.

Before me, the undersigned authority, personally appeared George M. Carpenter, who is known to me and who by me being duly sworn, doth depose and state as follows:

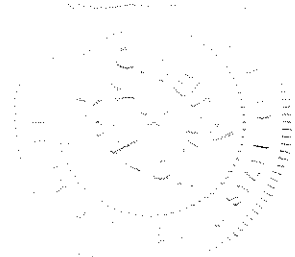
My name is George M. Carpenter. I am the Defendant in the above styled cause. The facts stated hereinabove are true and correct.

George M. Carpenter
George M. Carpenter

Sworn to and subscribed by George M. Carpenter before me on this
the 31st day of July, 1965.

Greg Carpenter
Notary Public

FILED
AUG 2 1965
ALICE J. DUCK, CLERK
REGISTER



SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons GEORGE M. CARPENTER, 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 TREADWELL FORD, INC.

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

Alice J. Duck
Clerk

* * * * *

COMPLAINT

ASSOCIATES DISCOUNT CORPORATION,)
an Alabama corporation, Assignee)
of TREADWELL FORD, INC.,)
PLAINTIFF,)
VS:)
GEORGE M. CARPENTER,)
DEFENDANT.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

6604

The Plaintiff claims of the Defendant TWO HUNDRED NINETY-NINE & 00/100 DOLLARS (\$299.00), due on promissory note made by him on the 8th day of February, 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
Forest A. Christian, Attorney for the
Plaintiff

Defendant may be served at :

General Delivery
Tibbie, Alabama

FILED

JUL 26 1965

ALICE J. DUCK, CLERK
REGISTER

64-7-29-65

RECEIVED IN OFFICE

This 28 day of July 1965
C. J. (Judson) SULLIVAN, Sheriff
Washington County, Ala.

Reid Singleton D.S.

EXECUTED

This 29 day of July 1965
by serving a copy of the within
on George M. Carpenter
C. J. (Judson) SULLIVAN, Sheriff
Washington County, Ala.

Reid Singleton D.S.

RECEIVED

JUL 26 1965

TAYLOR WILKINS
SHERIFF

6604
SUMMONS AND COMPLAINT

ASSOCIATES DISCOUNT CORPORATION,
an Alabama corporation, Assignee
of TREADWELL FORD, INC.,

PLAINTIFF,

VS:

GEORGE M. CARPENTER,

DEFENDANT.

FILED
JUL 26 1965
ALICE L. DICK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

SCOTT & PORTER

ATTORNEYS

CHATOM, ALABAMA

July 31, 1965

HOWARD G. SCOTT
DENNIS PORTER

647-2721
AREA CODE 205


Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Case No. 6604

Enclosed is an original and copy of a plea in abatement in the above styled cause. I am mailing the attorney for the Plaintiff a copy. If he does not wish to confess this plea in abatement, please give me several days notice before the case is set in order that I can arrange for representation of the Defendant.

Yours very truly,


Howard Scott

HS:ic