ASSOCIATES DISCOUNT CORPORATION, An Alabama corporation, Assignee of TREADWELL FORD, INC., I Plaintiff, I Vs.

RAY L. BRIGGS, Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 6608

## PLEA

Comes now the Defendant in the above styled cause by and through his attorney of record and files the following separate and several pleas to the complaint heretofore filed by the Plaintiff in this cause, to-wit:

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

CHASON, STONE & CHASON

FILED

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ALCE & MON CLERK REGISTER Attorneys for Defendant

The Defendant respectfully demands a trial of this cause by jury-

CHASON, STONE ? CHASON

by: John Evarle Chason

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

Plaintiff,

vs.

RAY L. BRIGGS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6608

PLEA

\* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \*

## SUMMONS

STATE OF ALABAMA, )
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons RAY L. BRIGGS, 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 2.6 day of July, 1965.

Olice Six Duck

\* \* \* \* \*\*\*\*\*\*

## COMPLAINT

Annual Control of the				
ASSOCIATES DISCOUNT CORPORATION, An Alabama corporation, Assignee		X		
of TREADWELL FORD,		X	IN THE CIRCUIT COURT OF	
	PLAINTIFF,	Y	IN THE CENCOLE COOKE OF	
		λ.	BALDWIN COUNTY, ALABAMA	
VS:		X	•	
RAY L. BRIGGS,		X	AT LAW )	
N	DEFENDANT.	I		

The Plaintiff claims of the Defendant FOUR HUNDRED TWENTY-FIVE & 97/100 DOLLARS (\$425.97), due on promissory note made by him on the 14th day of March, 1960, and payable on the first 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's address:

Route 1, Box 79 Bay Minette, Alabama

EX-7-27-65

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ALLE J. WILL, CLERK SEGISTER ATTE

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## SUMMONS AND COMPLAINT

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

PLAINTIFF,

RAY L. BRIGGS,

DEFENDANT.

WT 20 1965

LAW OFFICE OF FOREST A. CHRISTIAN FOLEY, ALABAMA