

ASSOCIATES DISCOUNT CORPORATION,
an Alabama corporation, Assignee
of JIMMIE DAVIS AUTO SALES,

PLAINTIFF

VS

ESTELLE SIMS,

DEFENDANT

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IN THE CIRCUIT COURT OF

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BALDWIN COUNTY, ALABAMA

Ø

AT LAW

Ø

CASE NO. 6611

Comes the defendant and for answer to the complaint filed in said cause shows as follows:

1. The Defendant denies the allegations of said complaint.

2. And for further answer thereof says that the basis of said complaint was the execution of a title retention sales contract between the defendant herein and Jimmie Davis Auto Sales, assignor of said sales contract and note to Associates Discount Corporation, an Alabama corporation and that said plaintiff herein through its agents, servants or employees repossessed said automobile. Hence, said plaintiff should not recover.

Mary Thompson White

Attorney for defendant

I, Mary Thompson White, hereby certify that I have this 4th day of February, 1966, delivered a copy of the foregoing answer to the Honorable Forest A. Christian, Attorney for the Plaintiff, Foley, Alabama, by United States Mail, Postage prepaid.

Mary Thompson White

FILED

FEB 7 1966

ALICE L. DICK, CLERK
REGISTER

479

ASSOCIATES DISCOUNT CORPORATION,
an Alabama Corporation, Assignee
of JIMMIE DAVIS AUTO SALES,

PLAINTIFF

VS

ESTELLE SIMS,

DEFENDANT

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6611

DEMURRER

Comes the Defendant in the above styled cause and demurs to the complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That said Count One of said complaint fails to allege the Plaintiff to be the holder of the note in due course.
3. Count One of said complaint fails to allege to whom the said note is payable.
4. Count One of said complaint fails to allege to whom the said note is payable.
5. Count One of said complaint fails to allege the original amount of said note.
6. Count One of said complaint fails to allege if the amount claimed is a balance due.

Mary Thompson White
Attorney for Defendant

The Defendant demands a trial of this cause by July.

Mary Thompson White
Attorney for Defendant

I, Mary Thompson White, hereby certify that I have this day 29th of August, 1965, delivered a copy of the foregoing demurrers to the Honorable Forest A. Christian, Attorney for the Plaintiff, Foley, Alabama, by United States Mail, Postage prepaid.

Mary Thompson White

FILED
AUG 30 1965
ALICE L. DUCK, CLERK REGISTERED

SUMMONS

STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons ESTELLE SIMS, 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 JIMMIE DAVIS AUTO SALES.

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

Alice J. Duck
Clerk

* * * * *

COMPLAINT

ASSOCIATES DISCOUNT CORPORATION,
an Alabama corporation, Assignee
of JIMMIE DAVIS AUTO SALES,

PLAINTIFF,

VS:

ESTELLE SIMS,

DEFENDANT.

Y
Y
Y
Y
Y
Y
Y

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
6611

The Plaintiff claims of the Defendant FIVE HUNDRED EIGHTEEN & 51/100 DOLLARS (\$518.51), due on promissory note made by him on the 11th day of June, 1960, 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's address:

Raybon Street
Bay Minette, Alabama

FILED

JUL 26 1965

ALICE J. DUCK, CLERK
REGISTER

64-7-30-65

6611

SUMMONS AND COMPLAINT

ASSOCIATES DISCOUNT CORPORATION,
an Alabama corporation, Assignee
of JIMMIE DAVIS AUTO SALES,

PLAINTIFF,

VS:

ESTELLE SIMS,

DEFENDANT.

Received 26 day of July 1965
and on 30 day of July 1965
I served a copy of the within AAC
on Estelle Sims

By service on _____

TAYLOR WILKINS, Sheriff
By W. G. Talbert, S.

FILED
JUL 26 1965
ALICE A. DICK, CLERK
REGISTRAR

MARY THOMPSON WHITE

Attorney-At-Law

ATMORE, ALABAMA 36502

Phone 368-4501

February 4, 1966

Honorable Alice J. Duck,
Circuit Clerk,
Baldwin County,
Bay Minette, Alabama.

Dear Mrs. Duck:

I am attaching an Answer in the case of Associates Discount Corporation versus Estelle Sims, which you will please file for me.

As you will note, I am mailing a copy to the Honorable Forest A. Christian, stated on the said Answer.

With kindest regards, I am

Sincerely,

Mary Thompson White

MTW/s
Attached (1)