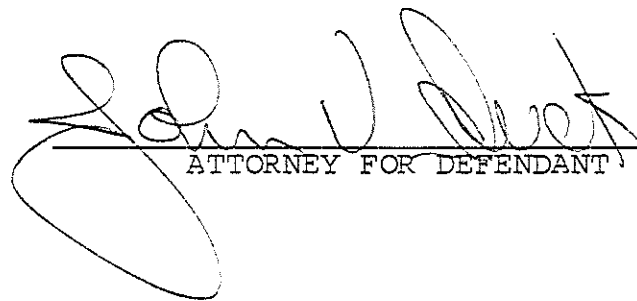


COMMERCIAL CREDIT CORPORATION,)	IN THE CIRCUIT COURT OF
a corporation,)	BALDWIN COUNTY, ALABAMA
Plaintiff,)	AT LAW, CASE NO. 6953
vs.)	
JAMES GARY STARR,)	
Defendant.)	

DEMURRERS

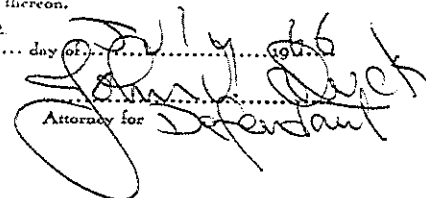
Comes now the Defendant in the above styled cause, and demurs to the Bill of Complaint filed herein, and assigns the following grounds:

1. That the said Bill of Complaint fails to state a cause of action.
2. That said Bill of Complaint does not state the day the contract was executed.
3. That said Bill of Complaint fails to allege the amount the vehicle brought under the said sale.
4. That said Bill of Complaint fails to allege the date of the sale.
5. That said Bill of Complaint fails to allege the amount of credit given to the Defendant from the sale.


 ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 18th day of July, 1966

 Attorney for Defendant

FILED
 JUL 20 1966
 JAMES L. DICK, CLERK
 BALDWIN COUNTY, ALABAMA

COMMERCIAL CREDIT CORPORATION,)
a corporation,

)
Plaintiff,

-VS-

)
JAMES GARY STARR,

)
Defendant.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

ALABAMA

AT LAW

CASE NO. 6953

Plaintiff claims of the defendant, \$451.56, due from him by written contract heretofore executed by the defendant. Plaintiff avers that the defendant breached said contract in that he failed and refused to pay the installments due thereunder and as a result of said default, the plaintiff did, in accordance with the terms of said contract, repossess the vehicle described in said contract. Plaintiff further avers that said vehicle was duly sold and that the price received therefore constituted the fair and reasonable market value of said vehicle at the time of said sale by plaintiff and that said sale price has been duly credited to the defendant's account and further, plaintiff avers that all just and proper credits have been allowed the defendant, but that the above sum remains due and unpaid. Plaintiff avers that in said contract the defendant waived as to this debt all rights of exemption under the Constitution and Laws of the State of Alabama, and further plaintiff claims the sum of \$90.31 as a reasonable attorney's fee, as provided under the terms of said contract, and plaintiff avers that said fee is reasonable.

GIBBONS & STOKES


ATTORNEY FOR PLAINTIFF

Serve the defendant at:

Route 1, Box 116, Silverhill, Alabama

FILED
MAY 8 1966
ALICE A. DIX, CLERK
REGISTERED

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6953

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JAMES GARY STARR

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, State of Alabama, at Bay Minette, against.....

JAMES GARY STARR

Defendant.....

by COMMERCIAL CREDIT CORPORATION, A Corporation

Plaintiff.....

Witness my hand this.....3rd.....day of.....May.....1966.....

Allice J. Black
163 Clerk

Executed
July 5, 1966

No. 6953

Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

COMMERCIAL CREDIT CORPORATION,

A Corporation,

Plaintiffs

vs.

JAMES GARY STARR,

Defendants

SUMMONS AND COMPLAINT

Filed May 3rd, 1966

Alice L. Duck Clerk

FILED

MAY 3 1966

ALICE L. DUCK, CLERK
REGISTER

Gibbons & Stokes

P.O. Box 293 Plaintiff's Attorney
Mobile, Ala.

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office
MAY 3 1966

TAYLOR WILKINS
SHERIFF

Sheriff

I have executed this summons

this 5th day of July 1966
by leaving a copy with

James Gary Starr

Sheriff's fee \$80
Total Costs per mile Total \$6.00
TAYLOR WILKINS, Sheriff
by *Charles Childress*
DEPUTY SHERIFF

Taylor Wilkins Sheriff
Charles Childress Deputy Sheriff

S. L. Hill

GIBBONS & STOKES

ATTORNEYS AT LAW
160 CONGRESS STREET
MOBILE, ALABAMA
TELEPHONE 433-2611

E. GRAHAM GIBBONS
B. F. STOKES, III

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA, 36601

March 25, 1967


Mrs. Alice Duck, Clerk
Circuit Court
Baldwin County
Bay Minette, Alabama

Re: Case #6953 Commercial Credit Corporation vs. James
Gary Starr

Dear Mrs. Duck:

The above captioned matter has been settled and I would appreciate your dismissing it on motion of the plaintiff and forward the cost bill to Honorable John V. Duck, Attorney at Law, Fairhope, Alabama.

Sincerely,


E. Graham Gibbons
Attorney for Commercial
Credit Corporation

EGG:he