

ASSOCIATES DISCOUNT CORPORATION,)
an Alabama Corporation, Assignee)
of Jimmie Davis Auto Sales, Inc.,)

Plaintiff,)

VS.)

ROBERT L. BROWN,)

Defendant.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

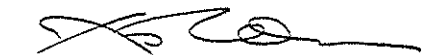
NO. 7092

PLEA


Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause and to each count thereof, separately and severally, says, separately and severally:

1. The allegations of the complaint are untrue.

2. For further answer to the complaint and to each count thereof the defendant says that he has paid the debt for the recovery of which this suit was brought, before the action was commenced.


Attorney for Defendant

Defendant demands a trial by jury
of said cause.


Attorney for Defendant

FILED

SEP 14 1936

CLERK
J. B. BROWN, Register

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons ROBERT L. BROWN, 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, INC.

Witness my hand this the 1st day of August, 1966.

Alice J. Luck
Clerk

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COMPLAINT

ASSOCIATES DISCOUNT CORPORATION,)
an Alabama Corporation, Assignee)
of Jimmie Davis Auto Sales, Inc.,)

PLAINTIFF,)

VS:)

ROBERT L. BROWN,)

DEFENDANT.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 2092

COUNT I:

The Plaintiff claims of the Defendant FOUR HUNDRED FIVE & 20/100 DOLLARS (\$405.20), due by promissory waive note made by him on the 13th day of March, 1962, and payable on the 13th day of March, 1964, with interest thereon.

Said note provides for a reasonable attorney's fee, which the Plaintiff alleges to be EIGHTY & 00/100 DOLLARS (\$80.00).

COUNT II:

The Plaintiff claims of the Defendant FOUR HUNDRED FIVE & 20/100 DOLLARS (\$405.20), due by an Alabama Installment Sales Contract made by him on the 13th day of March, 1962, and payable on the 13th day of March, 1964, with interest thereon.

Said contract provides for a reasonable attorney's fee, which the Plaintiff alleges to be EIGHTY & 00/100 DOLLARS (\$80.00).

Forest A. Christian
Attorney for the Plaintiff
Forest A. Christian
P. O. Drawer 190
Foley, Alabama 36535

Defendant's Address:

Route 1, Box 393A
Bay Minette, Alabama

FILED

AUG 1 1966

FILED
CLERK
REGISTER

363

Executed 8-6-66
Sgt. W. A. Tolbert - S.S.
W. A. Tolbert - S.S.

7092

Served 1 day of Aug. 1966
on 6 day of Aug. 1966
served a copy of the within JH
on Robert L. Brown
By service on
TAYLOR WILKINS, Sheriff
By W. A. Talbert
om

SUMMONS AND COMPLAINT

ASSOCIATES DISCOUNT CORPORATION,
An Alabama Corporation, Assignee
of Jimmie Davis Auto Sales, Inc.,

PLAINTIFF,

VS:

ROBERT L. BROWN,

DEFENDANT.

FILED
AUG 1 1966
ALICE L. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA