

Ace Home Supply Company

FINE FURNITURE

Television, Ranges, Refrigerators, Washing Machines

General Housefurnishings and Jewelry

900 W. ST. GEORGE AVENUE

LINDEN, NEW JERSEY

June 24, 1966

Waters & McPherson
725 Bergen Avenue
Jersey City, N. J.

Gentlemen:

In Re: Davidson

The following is an itemized list of purchases made by Emogena Davidson.

12/30/61	Clothing	\$110.00
Plus carrying charges and		
late fees - Balance due now is		<u>\$148.00.</u>

The following is a list of purchases made by Joyce Davidson.

9/27/61	Bedding and linens	\$66.00
10/14/61	Clothing	198.26
12/9/61	El. Razor & linens	45.05
12/13/61	Clothing	142.00
		<u>\$451.31</u>

Balance due including late fees \$455.31.

I hope this is the information you need.

Very truly yours,

ACE HOME SUPPLY COMPANY

H. Cohen

H. Cohen

hc/m

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7170

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Joyce Davidson

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.....

Joyce Davidson & Emogene Davidson, Jointly & Individually, Defendant.....

by ACE Home Supply, a Corporation, Plaintiff.....

Witness my hand this 14th day of December 1966

Et-7-11-67

Oliver J. Duck Clerk

No.....7170.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ACE HOME SUPPLY,

Plaintiffs

vs.

JOYCE DAVIDSON & EMOGENE DAVIDSON

Defendants

SUMMONS AND COMPLAINT

Filed December 14, 1966

Alice J. Duck Clerk

Gibbons & Stokes -P.O. Box 293
Mobile, Ala. Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

413 Gordon Street Bay Minette.

Received In Office

DEC 14 1966

19.....

TAYLOR WILKINS

Sheriff

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Returned 11 day of Jan. 1967
Not found in my room after diligent search and inquiry.

Taylor Wilkins, Sheriff

By W. A. Tolbert
Deputy Sheriff

Lives in Atmos
Address unknown

Sheriff

Deputy Sheriff

COUNTY OF HUDSON

STATE OF NEW JERSEY

Be it remembered, that on this _____ day of _____
A. D. 19____, personally appeared before me, the undersigned authority, _____
Harvey A. Cohen known to me
who being duly sworn, upon his oath stated that he is _____ Manager
of _____ Ace Home Supply
{ a corporation organized and doing business under the laws of the State of New Jersey
{ and has been duly authorized by said corporation to make this affidavit
{ a partnership composed of _____

~~a sole trader~~ doing business as _____
and that as such he makes this affidavit; that he is familiar with the books and business of
said _____ Ace Home Supply _____; that the attached account against
Joyce Davidson & Emogena Davidson of Bay Minette, Alabama
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
posing the said account were sold and delivered to said Joyce Davidson & Emogena Davidson
at { ~~its~~
 their } special instance and request, that credit has been duly given for all payments and
 his }
just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of Six Hundred Three Dollars & 31¢ Dollars
(\$ 603.31) with interest from _____ is justly due and
remains unpaid.

I hereby certify under my official seal that I am authorized as a Notary Public to
administer oaths under the laws of the State of New Jersey
and that the foregoing was subscribed and sworn to before me on the _____ day and year
first above stated.

Robert Van der Marck
NOTARY PUBLIC OF NEW JERSEY

MY COMMISSION EXPIRES AUG. 30, 1966

STATE OF NEW JERSEY
I CERTIFY THIS PLEADING
was filed in _____
_____ X

CLERK

107

ACE HOME SUPPLY, a corporation,) IN THE CIRCUIT COURT OF
 Plaintiff) MOBILE COUNTY,
 VS:) ALABAMA
 JOYCE DAVIDSON and EMOGENA) AT LAW
 DAVIDSON, jointly and individ-)
 ually,)
 Defendants) CASE NO. 19906

Plaintiff claims of the defendants, jointly and individually, \$603.31 due from them by account on December 30, 1961, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized, verified account, which will be offered in evidence at trial.

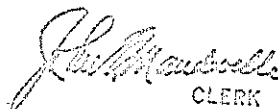

 ATTORNEY FOR PLAINTIFF

Serve both defendants at 413 Banyan Street, Bay Minette, Alabama, or c/o their place of employment, Vanity Fair Company, Robertsedale, Alabama.

106

STATE OF ALA. MOBILE CO.
 I CERTIFY THIS PLEADING
 WAS FILED ON

JUL 7 9 41 AM '66


 CLERK

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7170

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Joyce Davidson

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.....

Joyce Davidson & Emogene Davidson, Jointly & Individually, Defendant.....

by ACE Home Supply, a Corporation,

....., Plaintiff.....

Witness my hand this 14th day of December, 1966

Alice J. Duck, Clerk

No.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

ACE HOME SUPPLY, a corporation,) IN THE CIRCUIT COURT OF
 Plaintiff) MOBILE COUNTY,
 VS:) ALABAMA
 JOYCE DAVIDSON and EMOGENA) AT LAW
 DAVIDSON, jointly and individ-)
 ually,)
 Defendants) CASE NO. 19906

Plaintiff claims of the defendants, jointly and individually, \$603.31 due from them by account on December 30, 1961, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized, verified account, which will be offered in evidence at trial.

B. F. McRobert
 ATTORNEY FOR PLAINTIFF

Serve both defendants at 413 Banyan Street, Bay Minette, Alabama, or c/o their place of employment, Vanity Fair Company, Robertsedale, Alabama.

STATE OF ALA. MOBILE CO.
 I CERTIFY THIS PLEADING
 WAS FILED ON

Jan 7 1962

John Marshall
 CLERK

COUNTY OF HUDSON
STATE OF NEW JERSEY

Be it remembered, that on this _____ day of _____
A. D. 19____, personally appeared before me, the undersigned authority,
Harvey A. Cohen known to me
who being duly sworn, upon his oath stated that he is Manager
of Ace Home Supply
{ a corporation organized and doing business under the laws of the State of New Jersey
{ and has been duly authorized by said corporation to make this affidavit
{ a partnership composed of _____
a sole trader doing business as _____
and that as such he makes this affidavit; that he is familiar with the books and business of
said Ace Home Supply; that the attached account against
Joyce Davidson & Emogene Davidson of Bay Minette, Alabama
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
posing the said account were sold and delivered to said Joyce Davidson & Emogene Davidson
at { its } special instance and request, that credit has been duly given for all payments and
{ their }
{ his }
just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of Six Hundred Three Dollars & 31¢ Dollars
(\$603.31) with interest from _____ 19____ is justly due and
remains unpaid.

I hereby certify under my official seal that I am authorized as a Notary Public to
administer oaths under the laws of the State of New Jersey
and that the foregoing was subscribed and sworn to before me on the _____ day and year
first above stated.

[Signature]
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES _____

CLERK

Ace Home Supply Company

FINE FURNITURE

Television, Ranges, Refrigerators, Washing Machines
General Housefurnishings and Jewelry
900 W. ST. GEORGE AVENUE
LINDEN, NEW JERSEY

June 24, 1966

Waters & McPherson
725 Bergen Avenue
Jersey City, N. J.

Gentlemen:

In Re: Davidson

The following is an itemized list of purchases made by Emogena Davidson.

12/30/61	Clothing	\$110.00
Plus carrying charges and late fees - Balance due now is		<u>\$148.00.</u>

The following is a list of purchases made by Joyce Davidson.

9/27/61	Bedding and linens	\$66.00
10/14/61	Clothing	198.26
12/9/61	El. Razor & linens	45.05
12/13/61	Clothing	142.00
		<u>\$451.31</u>

Balance due including late fees \$455.31.

I hope this is the information you need.

Very truly yours,

ACE HOME SUPPLY COMPANY

H. Cohen

H. Cohen

hc/m

ACE HOME SUPPLY, a
corporation,

Plaintiff,

Vs.

JOYCE DAVIDSON and
EMOGENE DAVIDSON,
jointly and individually,

Defendants.

*

IN THE CIRCUIT COURT OF

*

BALDWIN COUNTY, ALABAMA

*

AT LAW

*

CASE NO. _____

PLEA

Comes now the Defendant, Emogene Davidson, Defendant in the
above-styled cause, and for plea to the complaint heretofore filed
in this cause, says:

1. Not guilty.
2. The allegations of the complaint are untrue.

Kenneth Cooper
ATTORNEY FOR DEFENDANT,
EMOGENE DAVIDSON.

I hereby certify that I have served a copy of the foregoing
PLEA upon Hon. E. Graham Gibbons, by mailing to him a copy thereof
addressed to him at P. O. Box 293, Mobile, Alabama, 36601, by de-
positing the same in United States mail, postage prepaid, at Bay
Minette, Alabama, this 5th day of December, 1966.

Kenneth Cooper
ATTORNEY FOR DEFENDANT,
EMOGENE DAVIDSON.

FILED
DEC 6 1966
ALICE I. DUCK, CLERK
REGISTERED

ACE HOME SUPPLY, a corporation

VS.

JOYCE DAVIDSON and EMOGENA DAVIDSON,
jointly and individually

} IN THE CIRCUIT COURT OF
}
}
} MOBILE COUNTY, ALABAMA
}
} CASE NO. 19906 - BOLLING

STATE OF ALABAMA }

COUNTY OF BALDWIN }

} IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

I, ALICE J. DUCK, Clerk of the Circuit Court of Baldwin County, Alabama, do hereby certify that I have this day received and filed in this office, the complete transcript of the records and proceedings had in the above entitled cause in the Circuit Court of Mobile County, Alabama, together with the bill of costs to date in said Court.

DONE this the 8 day of September, 1966.

ATTEST:

Alice J. Duck
CLERK, CIRCUIT COURT, BALDWIN COUNTY, ALABAMA

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA, AT LAW

CASE NO. 19906 -- BOLLING

B. F. STOKES, III

ACE HOME SUPPLY, a corporation

N.J.

Vs. Suit for \$603.31 due by account

Kenneth Cooper
109 East 1st Street
Bay Minette, Ala.

JOYCE DAVIDSON and EMOGENA DAVIDSON,
jointly and individually

PLEADINGS, PROCESS, ETC. * FILING DATE *

- | | |
|------------------------|---------|
| 1. Complaint & Summons | 7-7-66 |
| 2. Item. Veri. Account | 7-7-66 |
| 3. Plea in Abatement | 8-11-66 |
| (Emogena Davidson) | |

* C/S served on Emogena Davidson on July 20, 1966.
* C/S as to Joyce Davidson returned July 26, 1966 "Not Found".

* September 2, 1966 - Defendant, Emogena Davidson's Plea in Abatement
* Sustained and cause as to her ordered transferred
* to the Circuit Court of Baldwin County.
* William D. Bolling, Judge

34-100

I, JOHN E. MANDEVILLE, in my capacity as Clerk of the Circuit Court of Mobile County, Alabama, hereby certify that the above is a true and correct transcript of all the minutes, orders and other proceedings in the above styled case in this Court.

In witness whereof I have hereunto set my hand and attached my official seal as such Clerk of said Court at Mobile, Mobile County, Alabama, on this the 7th day of September, 1966.

John E. Mandeville, Clerk.

95

FILED
SEP 14 1966
MOBILE, ALA.

THE STATE OF ALABAMA
MOBILE COUNTY

CIRCUIT COURT

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon

JOYCE DAVIDSON and EMOGENA DAVIDSON,

jointly and individually

to appear within thirty days from service of this process, in the Circuit Court of Mobile County, Alabama,
at the place of holding the same, then and there to answer the complaint of

ACE HOME SUPPLY, a corporation

WITNESS: John E. Mandeville, Clerk of said Court, this 7th day of July, 19 66

Attest: *John E. Mandeville*
Clerk

SHERIFF'S RETURN

Received _____ day of _____, 19____ and on _____ day
of _____, 19____, I served a copy of
the within _____ on _____
by service on _____

RAY D. BRIDGES, SHERIFF

SSy _____ D.S.

REC'D. SHERIFF DEPT.
MOBILE COUNTY, ALA.

JUL 8 4 26 PM '66

BY _____

JUDGE

No. 19906

DOCKET

CIVIL DIVISION

CIRCUIT COURT
MOBILE COUNTY

AGE HOME SUPPLY,
a corporation

VS.

Complaint and Summons

JOYCE DAVIDSON and EMOGENA
DAVIDSON, jointly and
individually

Issued 7th day of July, 19 66

Defendant's Address

413 Banyan Street
Bay Minette, Ala. or
c/o Employment
Vanity Fair Co.
Robertsdale, Ala.

B. F. S. TOKES, III

Plaintiff's Attorney

Received 12 day of July 66
and on 20 day of July 66
served a copy of the within Set
on Joyce Davidson
Emogena Davidson
by service on _____

TAYLOR WILKINS, Sheriff

By W. A. Tolbert

5 miles East of
B.M.

Joyce Davidson
not found in this
County
Address

Joyce Davidson
225 Rickelle Ave
Lincoln Ill.

Sheriff claims 10 miles at

Ten Cents per mile Total \$ 1.00

TAYLOR WILKINS, Sheriff

By W. A. Tolbert
DEPUTY SHERIFF

KENNETH COOPER

ATTORNEY AT LAW

109 EAST 1ST STREET

BAY MINETTE, ALABAMA

TELEPHONE 937-7412

4 August, 1966

Mr. John E. Manderville
Clerk, Circuit Court
Mobile County Courthouse
Mobile, Alabama

Re: Ace Home Supply vs Joyce
Davidson, et al. Civil
Case No. 19906 - *B*

Dear John:

Inclosed is Plea In Abatement to be filed in above-styled cause. You will note the Attorney of Record, has been mailed his copy of the plea.

Sincerely,

Kenneth Cooper
Kenneth Cooper

KC/lb
1 incl.

STATE OF ALA. MOBILE CO.
I CERTIFY THIS PLEADING
WAS FILED ON

AUG 11 8 29 AM '66

John E. Manderville
CLERK

ACE HOME SUPPLY, a
corporation,

Plaintiff,

Vs.

JOYCE DAVIDSON and
EMOGENA DAVIDSON,
jointly and individually,

Defendants.

*

IN THE CIRCUIT COURT OF

*

MOBILE COUNTY, ALABAMA

*

AT LAW

*

CASE NO. 19906

PLEA IN ABATEMENT

Comes now the Defendant, ~~Joyce~~ ^{Emogene} Davidson, one of the Defendants in above-styled cause, for the special purpose of filing the following plea, separately and severally, to each and every Count of the Complaint in said cause, and for no other purpose:

The said ~~Joyce~~ ^{Emogene} Davidson alleges that at the time said suit was instituted, and at the time said action arose, she was a bona fide resident of Baldwin County, State of Alabama, and that the Circuit Court of Mobile County, Alabama, is without jurisdiction to try this suit.

Emogene Davidson
Defendant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Kenneth Cooper, Notary Public, State At Large, State of Alabama, personally appeared ~~Joyce~~ ^{Emogene} Davidson, one of the Defendants in above styled cause, who, being by me first duly and legally sworn, says on oath that the facts set forth in the foregoing plea are true and correct.


Emogene Davidson
Defendant

Sworn and subscribed to before me this 8 day of August, 1966.

96

Kenneth Cooper
Notary Public,
State At Large, State of Alabama

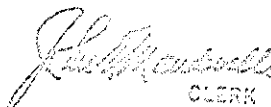
I hereby certify that I have served a copy of the foregoing
Plea In Abatement to Hon. B. F. Stokes, Suite 201, American
National Bank Building, Mobile, Alabama, by depositing a copy of
same in United States mail, postage prepaid, at Bay Minette, Ala-
bama, on this 8 day of August, 1966.


Attorney For Defendant

97

STATE OF ALA. MOBILE CO.
I CERTIFY THIS PLEADING
WAS FILED ON

AUG 11 8 29 AM '66


CLERK

GIBBONS & STOKES

ATTORNEYS AT LAW

201 AMERICAN NATIONAL BANK BUILDING

BIENVILLE OFFICE

MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS
B. F. STOKES, III

August 26, 1966

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

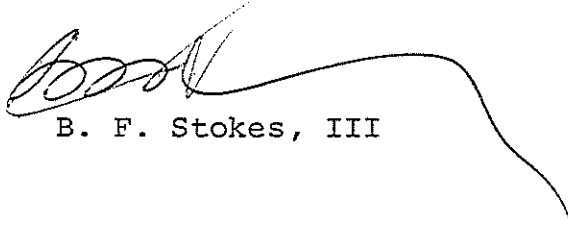
Mr. John E. Mandeville, Clerk
Circuit Court
Mobile County Court House
Mobile, Alabama

Re: Ace Home Supply, a corporation, vs. Joyce Davidson
and Emogena Davidson, et al, 19906 - *B*

Dear Sir:

A plea in abatement has been filed in the above case. Kindly
set the same down for hearing on the next available motion
docket.

Sincerely yours,



B. F. Stokes, III

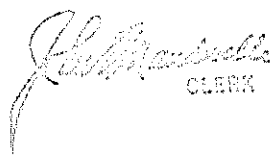
BFS:jh

cc: Mr. Kenneth Cooper
Attorney at Law

*Set
Sept 2, 1966*

STATE OF ALA. MOBILE CD.
I CERTIFY THIS PLEADING
WAS FILED ON

AUG 29 1 25 PM '66



CLERK

FRIDAY, SEPTEMBER 2, 1966

ACE HOME SUPPLY, a Corporation)	
BOLLING -vs- 19906)	DEFENDANT, EMOGENA DAVIDSON'S
JOYCE DAVIDSON & EMOGENA DAVIDSON,)	PLEA IN ABATEMENT SUSTAINED,
jointly and individually)	AND CAUSE AS TO HER ORDERED
)	TRANSFERRED TO THE CIRCUIT
)	COURT OF BALDWIN COUNTY

This day in open Court came the parties by their attorneys, and defendant, Emogena Davidson's Plea in Abatement filed August 11, 1966, in this cause, coming on to be heard and being argued by counsel and understood by the Court;

It is ordered and adjudged by the Court that defendant, Emogena Davidson's said Plea in Abatement filed August 11, 1966, in this cause be, and the same is hereby sustained, and cause as to her is hereby ordered transferred to the Circuit Court of Baldwin County, Alabama.

Minute Book No. 34

Page No. 100

STATE OF ALABAMA, }
COUNTY OF MOBILE }

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

I, JOHN E. MANDEVILLE, Clerk of the Circuit Court of Mobile County, Alabama, do hereby
certify that the foregoing is a full, true and correct copy of the order transferring
cause to Circuit Court of Baldwin County, Alabama

as rendered by the said Circuit Court on the 2nd day of September, 1966, in the cause
entitled No. 19906 - ACE HOME SUPPLY, a Corporation

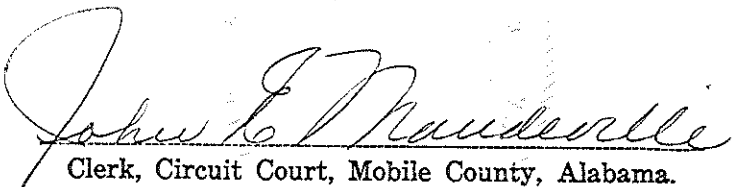
_____, Plaintiff,

— versus — JOYCE DAVIDSON & EMOGENA DAVIDSON, jointly and
individually

Defendant, ~~(Together with the cancellation thereof)~~ as the same remains of record in this office in
Minute Book No. 34, Page No. 100

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Seal of said Court at office
in the City of Mobile, Alabama, on this the 7th day of September, 19 66.

ATTEST:


Clerk, Circuit Court, Mobile County, Alabama.

Plaintiff

VS.

Defendant

(Act No. 571, Reg. Ses. Leg. 1955)
(Amend Sec. 34 and 100, Title 11, Code Ala. 1940)

CLERK'S FEES		Pltff.		Deft.		SHERIFF'S FEES		Pltff.		Deft.	
Suits for \$100 or less	\$ 6.00					Serving Summons & Complaint	\$ 1.50	1	50		
Suits for over \$100 but less than \$1,000	10.00	10	00			Serving Writ of Garnishment	1.50				
Suits for \$1,000 and over	20.00					Serving Sci Fa.-Notices	1.50				
Suits in detinue, ejectment, etc.	10.00					Levying Attachment & Return	6.25				
Suits not otherwise provided	10.00					Executing Writ Possession	5.00				
Writs, Mandamus, Prohibition, etc.	15.00					Seizing personal property under Writ of Detinue	6.00				
Appeals from Court General Sessions	15.00					Serving subpoenas, each75				
Appeals from Probate Court	20.00					Impanelling Jury75				
Appeals from JP Courts	6.00					Taking & Approving Bond	2.00				
Appeals from State Dept of Pub. Safety, and other State Agencies	10.00					Collecting Costs Execution	1.50				
Workmen's Compensation Settle.	10.00					Serving Contempt Writ	1.50				
Garnishment on Judgment	6.00					Making Deed for Property sold	2.50				
Order of Sale, Motions to sell.	6.00					Commission, collecting money on executions, 1st \$200 5%; \$200 to \$500 4%; over \$500 3% \$					
Recording executions from State Agencies	3.00						\$				
Cert. Copy of Record - per 100 words15	80				Total	\$	1	50		
Taking Appeal Bond75					RECAPITULATION					
Record for Supreme Court etc., per 100 words15					Clerk		10	80		
Add'l Copies of Record for Supreme Court, per 100 words05					Sheriff		1	50		
Checking - including Reporters Transcript of Evidence	10.00					Inferior Civil Court					
Certifying Abstract in lieu of Transcript on Appeal	5.00					Justice Peace fees					
Collecting Money on Judgments over 30 days old, ½ the per- centage allowed Sheriffs	\$					Witness fees					
						Commissioner's fees					
						Certificate of Judgment					
						Judgment					
						10% Damages					
						Interest					
						Stenographer's fees (\$10.00 Day)					
						Library fee	1.50	1	50		
						Trial Tax (County)	1.50	1	50		
						Trial Tax (State)	1.50	1	50		
						Advertisement					
						Garnishee's fees					
Total	\$	10	80								

JOHN E. MANDEVILLE, Clerk

GIBBONS & STOKES

ATTORNEYS AT LAW

201 AMERICAN NATIONAL BANK BUILDING

BIENVILLE OFFICE

MOBILE, ALABAMA

TELEPHONE 433-2611

NEW MOBILE
160 CONGRESS ST.

E. GRAHAM GIBBONS
B. F. STOKES, III

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

December 13, 1966

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

Re: Case #7170 Ace Home Supply vs. Davidson and Davidson

Dear Mrs. Duck:

Please issue an alias complaint and summons against the defendant,
Joyce Davidson, at the following address: 413 Banyan Street,
Bay Minette, Alabama

Sincerely,


E. Graham Gibbons

EGG:he

MEMO TO SHERIFF'S OFFICE: Mr. Kenneth Cooper indicates that
this lady is returning to her home in the near future and I
would appreciate your serving her at the home of the other
defendant. Thank you.