

HERBERT G. RUSSELL and
ORA DEE RUSSELL,

PLAINTIFFS,

VS.

ELISHA JACKSON, JR.,

DEFENDANT,

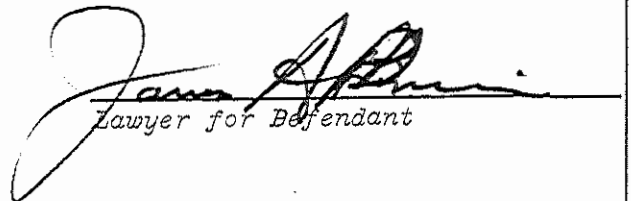
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. _____

Comes the Defendant in the above entitled cause and appearing specially and only for the purpose of filing this Plea in Abatement and says as follows: That the Defendant in this cause at the time of the filing of this suit, and at the time of service of process on this Defendant and at the time the alleged debt was made which is the basis of this suit, he was, and is, a bona fide resident citizen of Clarke County, Alabama; that said Defendant maintains a permanent place of residence in Clarke County, Alabama; that said Defendant at the time the alleged debt was contracted, at the time said suit was filed and at the time service of process was had on this Defendant, was not and is not now, a resident citizen of Baldwin County, Alabama; that the Circuit Court of Baldwin County, Alabama is without jurisdiction to try this cause.

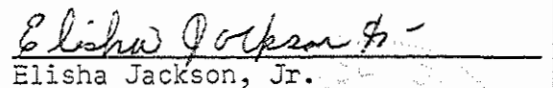
WHEREFORE THE PREMISES CONSIDERED the Defendant moves that this cause be abated and that the Defendant go hence without day with reasonable costs in this behalf expended.


Lawyer for Defendant

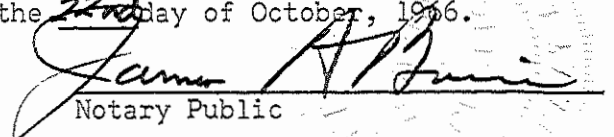
STATE OF ALABAMA

COUNTY OF CLARKE

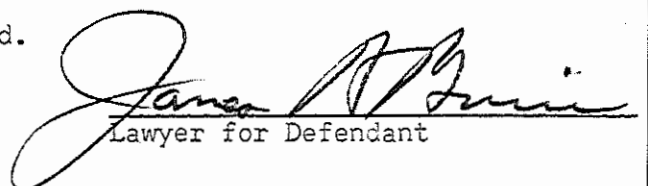
Before me the undersigned authority, personally appeared Elisha Jackson, Jr., who is known to me and who being by me duly sworn, deposes and says that the allegations contained in the foregoing plea are true and correct.


Elisha Jackson, Jr.

Sworn and subscribed before me this the 22nd day of October, 1966.


Notary Public

I do hereby certify that I have this date mailed a copy of the foregoing pleading to Harry J. Wilters, Jr., Attorney of Record for the Plaintiff, at his address, by U. S. mail, postage pre-paid.


Lawyer for Defendant

FILED

OCT 26 1966

ALICE L. BUCK, CLERK

469

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Elisha Jackson, Jr., to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and thereto answer the Complaint of Herbert G. Russell and Ora Dee Russell.

Witness my hand, this the 7th day of Oct., 1966.

Alice J. Quick
Clerk,

HERBERT G. RUSSELL and
ORA DEE RUSSELL,

Plaintiffs,

vs.

ELISHA JACKSON, JR.,

Defendant,

X
IN THE CIRCUIT COURT OF

X
BALDWIN COUNTY, ALABAMA

X
AT LAW

X
CASE NO. 2201

X

The Plaintiffs claim of the Defendant the sum of ONE HUNDRED DOLLARS (\$100.00), due by promissory note made by him on the 2nd day of October, 1964, and payable twelve months from the date of the note, with interest thereon.

The note provides that in the event of default the maker will be liable for reasonable attorneys fee for which the Plaintiffs claim in the amount of TWENTY-FIVE DOLLARS (\$25.00).

WILTERS & BRANTLEY

BY: Ray J. Walters

Attorneys for the Plaintiffs

The Defendant works at Smith Lumber Company in Jackson, Alabama, and also at the Hospital in Jackson, Alabama.

EX-10-13-66

FILED

OCT 7 1966

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RECEIVED

OCT 7 1966

TAYLOR WILKINS
SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 2200

HERBERT G. RUSSELL and
ORA DEE RUSSELL,

Plaintiffs.

vs.

ELISHA JACKSON, JR.,

Defendant

SUMMONS AND COMPLAINT

WILTERS & BRANTLEY
Attorneys at Law
Bay Minette, Alabama

OCT 7 1966

ALICE J. RUCK, CLERK
RECEIVED

Executed by serving copy of within on

Elisha Jackson
Name

This the 13 day of Oct 1966

H. D. Paul, Sheriff

By _____, D.

THE SHERIFF CLAIMS 32

MILES AT 10¢ PER MILE FOR

A TOTAL OF \$ 3.20

H. D. Paul, Sheriff