

GENERAL FINANCE CORPORATION,  
an Alabama corporation,

Plaintiff,

vs.

LEROY LANCASTER,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

NO. 7265

Comes the Defendant and for plea to the Complaint filed  
in said cause, and each and every count thereof, separately and  
severally, says:

1. Not guilty.
2. That the allegations of the Complaint are untrue.

For further plea to Count One of such Complaint the  
Defendant says that the note, upon which the action is founded,  
was not executed by him, or by anyone authorized to bind him in  
the premises, and he makes oath that this plea is true.

Leroy Lancaster  
Defendant

Sworn to and subscribed before me

this 18<sup>th</sup> day of NOV,

1966.

J. H. Chason  
Notary Public, Baldwin County, Alabama

Defendant demands trial of this cause  
by a jury.

CHASON, STONE & CHASON

By: J. H. Chason  
Attorneys for Defendant

#### CERTIFICATE OF SERVICE

I certify that a copy of the foregoing  
pleading has been served upon counsel  
for all parties to this proceeding, by  
mailing the same to each by First Class  
United States Mail, properly addressed  
and postage prepaid on this 18<sup>th</sup> day  
of NOV 1966

J. H. Chason

7265

*Jerry*

GENERAL FINANCE CORPORATION,  
an Alabama corporation,

Plaintiff,

vs.

LEROY LANCASTER,  
Defendant.

\*\*\*\*\*

PLEA

\*\*\*\*\*

FILED

NOV 18 1966

ALICE A. DUCK, CLERK  
REGISTRAR

SUMMONS

STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons LEROY LANCASTER 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 GENERAL FINANCE CORPORATION.

Witness my hand this the 16 day of November, 1966.

*Alice J. Dunn*  
Clerk

\*\* \*\* \*

COMPLAINT

GENERAL FINANCE CORPORATION, X  
An Alabama Corporation, X  
PLAINTIFF, X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

VS: X

AT LAW

LEROY LANCASTER, X

CASE NO. 7965

DEFENDANT. X

COUNT I

The Plaintiff claims of the Defendant ONE THOUSAND TWO HUNDRED EIGHTY-NINE & 00/100 DOLLARS (\$1,289.00), due by promissory note made by him on the 16th day of August, 1965, and payable on the 1st day of July, 1966, with interest thereon.

Said note provides for a reasonable attorney's fee, which the Plaintiff alleges to be ONE HUNDRED NINTY (\$190.00) DOLLARS.

COUNT II

The Plaintiff claims of the Defendant ONE THOUSAND TWO HUNDRED EIGHTY-NINE & 00/100 DOLLARS (\$1,289.00), due from him by account on, to wit: the 1st day of July, 1966, which sum of money, with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant ONE THOUSAND TWO HUNDRED EIGHTY-NINE & 00/100 DOLLARS (\$1,289.00), due from him on account stated between the Plaintiff and the Defendant on, to wit: 1st day of July, 1966, which sum of money, with interest thereon, is still unpaid.

COUNT IV

The Plaintiff claims of the Defendant ONE THOUSAND TWO HUNDRED EIGHTY-NINE & 00/100 DOLLARS (\$1,289.00), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of July, 1966, which sum of money, with interest thereon is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 8th day of November, 1966.

Defendant's address:  
Box 202  
Stockton, Alabama

*Forest A. Christian*  
Forest A. Christian, P. O. Box 190,  
Foley, Alabama, Attorney for the Plaintiff



NOV 16 1966

ALICE J. DUNN, CLERK  
REGISTER

Executed  
Nov 17, 1966

577

Taylor Williams Jr. WA Tolbert SS

COUNTY OF Mobile

STATE OF Alabama

Be it remembered, that on this 8th day of November  
A. D., 1966, personally appeared before me, the undersigned authority,  
Roger B. Southern known to me  
who being duly sworn, upon his oath stated that he is Assistant Branch Manager  
of General Finance Corporation of Mobile, 1119 Springhill Ave., Mobile, Ala.  
{ a corporation organized and doing business under the laws of the State of Alabama  
{ 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 General Finance Corporation of Mobile; that the attached account against  
Leroy Lancaster of Box 202, Stockton, 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 Leroy Lancaster  
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 ONE THOUSAND TWO HUNDRED EIGHTY-NINE\*\*\*\*\* Dollars  
(\$1289.00) with interest from None 19       is justly due and  
remains unpaid.

Roger B. Southern X

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 Alabama  
and that the foregoing was subscribed and sworn to before me on the day and year  
first above stated.

Douglas E. McPherson

Notary Public

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BRANCH 497	CONTRACT NUMBER 5963	DUE DATE 30	O.C. N	N-U 65	YEAR 65	MAKE Ford	MODEL Galaxie	STYLE 500 2Dr. HT V-8	IDENTIFICATION NUMBER 5A66X235704
NAME-ADDRESS LANCASTER, Leroy Box 202 Stockton, Alabama			SCHEDULE OF COVERAGE A (1) COMPREHENSIVE EXCLUDING COLLISION (2) PERSONAL EFFECTS \$100		LIMITS OF LIAB. ACTUAL CASH VALUE 40.00	ANNUAL PREM.	EXTENDED PREM.	EXTENDED PREM.	PREMIUM LIFE PREMIUM H & A Repossessed 3-10-66 LJV#40
DATE OF CONTRACT 8-16-65			B COLLISION ACTUAL CASH VALUE LESS \$ 50 DED 145.00						
LAST INSTALMENT DUE 8-30-68			C FIRE, LIGHTNING & TRANSPORTATION ACTUAL CASH VALUE						
CO-SIGNER			D THEFT ACTUAL CASH VALUE						
NUMBER & AMOUNT OF INSTALMENTS 36 @ 94.95 9-30-65			E COMBINED ADD. COVERAGE ACTUAL CASH VALUE						
EMPLOYER & OCCUPATION Bacon-McMillian Co.			F TOWING & LABOR \$ PER DISABLMY 2.00						
SYM-5 CL 2A SC			TOTAL 187.00						
DATE INSURANCE EFFECTIVE 8-16-65			DATE INSURANCE EXPIRES 8-16-66					TOTAL PREMIUM 187.00	
DEALER NAME AND NO. Treadwell #800			HOME PHONE		BUSINESS PHONE		TIME SELLING PRICE		
EQUIP. R HWWT VT AT							CASH DOWN PAYMENT		
DATE PURCHASED 8-20-65			RATE		TIME EMP.		AGE		
					M-S		CR. GRADE		
					APPRAISAL		YARDSTICK		
					\$ OVER		% DOWN CON. ACT.		
							CHECK		
							DEFERRED CERTIFICATE		
AMT. EACH INSTALMENT			DATE PAID		DUE DATE		BALANCE		IRREGULAR REMITTANCES
1	2	3	AMOUNT OF CONTRACT		3418.20		REF		DATE
			94.95	10-19	SEP 30				DATE
			94.95	11-12	OCT 30				AMOUNT
			94.95	12-14	NOV 30				BALANCE
			94.95	1-19	DEC 30			3-10 Bal.	3038.40
			94.95		JAN 30			3-10 14.00	3052.40
			94.95		FEB 30			Repossession Balance	
			94.95		MAR 30				
			94.95		APR 30				
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			94.95		NOV 30				

received 16 day of Nov 1968  
at on 17 day of Nov 1968  
received a copy of the within etc.  
Leroy Lancaster  
service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W A Tolbert  
Stockton

Sheriff claims 22 miles at  
Ten Cents per mile Total 2.20  
TAYLOR WILKINS, Sheriff  
BY W A Tolbert  
DEPUTY SHERIFF

SUMMONS

GENERAL FINACE CORPORATION,  
An Alabama Corporation,

PLAINTIFF,

VS:

LEROY LANCASTER,

DEFENDANT.

**FILED**  
NOV 16 1968  
ALICE J. DICK, CLERK  
REGISTRY

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA