

GENERAL FINANCE CORPORATION,
an Alabama Corporation,

PLAINTIFF

VS

WILLIAM E. BOZEMAN,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. 7266

ANSWER

Comes now the Defendant in the above styled cause and for answer to Plaintiff's Bill of Complaint, says:

1.

The matters alleged therein are untrue.

2.

The Defendant for answer to the said Complaint says that he has paid the debt, for the recovery of which this suit was brought, before the action was commenced.

3.

Defendant for further answer to the said Complaint, says that, after the Plaintiff Mortgagee repossessed the merchandise it was sold for less than the fair and reasonable value and that the Plaintiff has not accounted to the Defendant for at least fair and reasonable value of the property.

W E Bozeman

Defendant

WILTERS, BRANTLEY & NESBIT

By: Phyllis L. Nesbit

Attorneys for Defendant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Florence Drake, a Notary Public, in and for said County, in said State, personally appeared William E. Bozeman, who, being known to me, and by me first duly sworn, deposes and says on oath; that he is the Defendant in the above entitled cause and has personal knowledge of the facts stated in the foregoing Pleas and that the said statements of fact therein contained are true.

W E Bozeman

Sworn to and subscribed before me this 14th day of December 1966.

FILED
DEC 15 1966

Florence Drake
Notary Public

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

GENERAL FINANCE CORPORATION,
an Alabama Corporation,
Plaintiff

Vs

WILLIAM E. BOZEMAN,
Defendant

ANSWER

Forest A. Christian,
Box 190
Foley, Alabama

Plaintiff's attorney

Wilters, Brantley & Nesbit
Robertsdale, Alabama

Defendant's attorney

FILED

DEC 15 1966

ALICE L. DICK, CLERK
Baldwin County

GENERAL FINANCE CORPORATION,
an Alabama Corporation,

Plaintiff

Vs.

WILLIAM E. BOZEMAN,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. 7266

The Defendant demands a trial by jury.

WILTERS & BRANTLEY & NESBIT

BY:

Shirley S. Nesbit
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 15 day of December
1966, served a copy of the foregoing pleading on each of all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, and this I do hereby certify.

WILTERS & BRANTLEY & NESBIT

Shirley S. Nesbit

FILED

DEC 15 1966

ALICE L. DICK, CLERK

NO. 7266

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
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GENERAL FINANCE CORPORATION,
an Alabama Corporation,

Plaintiff

Vs.

WILLIAM E. BOZEMAN,

Defendant

ANSWER

Forest A. Christian,
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Foley, Alabama

Plaintiff's attorney

Wilters, Brantley & Nesbit
Robertsdale, Alabama

Defendant's attorney

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons WILLIAM E. BOZEMAN, 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, an Alabama Corporation.

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

Clive J. ...
Clerk

** ** *

COMPLAINT

GENERAL FINANCE CORPORATION,
An Alabama corporation,

PLAINTIFF,

VS:

WILLIAM E. BOZEMAN,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7266

COUNT I

The Plaintiff claims of the Defendant ONE THOUSAND NINETY & 00/100 DOLLARS (\$1,090.00), due by promissory note made by him on the 28th day of September, 1965, with interest thereon.

Said note provides for a reasonable attorney's fee, which the Plaintiff allèges to be ONE HUNDRED SIXTY & 00/100 DOLLARS (\$160.00).

COUNT II

The Plaintiff claims of the Defendant ONE THOUSAND NINETY & 00/100 DOLLARS (\$1,090.00), 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 NINETY & 00/100 DOLLARS (\$1,090.00), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 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 NINETY & 00/100 DOLLARS (\$1,090.00), 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 32
Loxley, Alabama

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

FILED

NOV 16 1966

CLERK
REGISTER

580

Executed

Nov 16 1966
J. L. Wilkins
W. O. ... DS

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, Alabama
{ 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
William E. Bozeman of Box 32, Ioxley, 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 William E. Bozeman

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 ONE THOUSAND NINETY***** Dollars
(\$1090.00) 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.

Doyle E. McPherson
Notary Public

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BRANCH 497	CONTRACT NUMBER 6075	DUE DATE 17	O.C. N	N-U N	YEAR 65	MAKE Rambler	MODEL 4Dr. S/W 6508-2	STYLE	IDENTIFICATION NUMBER P157136
NAME-ADDRESS BOZEMAN, William E. Box 32 Loxley, Alabama			SCHEDULE OF COVERAGE A (1) COMPREHENSIVE EXCLUDING COLLISION (2) PERSONAL EFFECTS		LIMITS OF LIAB ACTUAL CASH VALUE \$100	ANNUAL PREM.	EXTENDED PREM.	EXTENDED PREM.	
DATE OF CONTRACT 9-28-65			LAST INSTALMENT DUE 10-17-68		C/F American Indemnity Co.		Repossessed 2-1-66 LJV#23		
CO-SIGNER			SYM- CL SC		PER DISABLMT				
NUMBER & AMOUNT OF INSTALMENTS 36 @ 79.01 11-17-65			DEALER NAME AND NO. Richard Rambler #707		HOME PHONE		TIME SELLING PRICE		
EMPLOYER & OCCUPATION State Highway Dept. Carpenter			EQUIP.		BUSINESS PHONE		CASH DOWN PAYMENT		
DATE PURCHASED 9-28-65			RATE		TIME EMP.	AGE	M-S	CR. GRADE	APPRAISAL
					YARDSTICK	\$ OVER	% DOWN CON.	% DOWN ACT.	CHECK DEFERRED CERTIFICATE
AMT. EACH INSTALMENT			DATE PAID	DUE DATE	BALANCE	IRREGULAR REMITTANCES			INSURANCE
1	2	3	AMOUNT OF CONTRACT		2844.36	REF	DATE	AMOUNT	BALANCE
			79.01	11-29	NOV 17		2-7	Bal.	2765 35
			79.01		DEC 17		2-7	1 00	2766 35
			79.01		JAN 17		Repossession Balance		
			79.01		FEB 17				
			79.01		MAR 17				
			79.01		APR 17				
			79.01		MAY 17				
			79.01		JUN 17				
			79.01		JUL 17				
			79.01		AUG 17				
			79.01		SEP 17				
			79.01		OCT 17				
			79.01		NOV 17				
			79.01		DEC 17				
			79.01		JAN 17				
			79.01		FEB 17				
			79.01		MAR 17				
			79.01		APR 17				
			79.01		MAY 17				
			79.01		JUN 17				
			79.01		JUL 17				
			79.01		AUG 17				
			79.01		SEP 17				
			79.01		OCT 17				
			79.01		NOV 17				
			79.01		DEC 17				
			79.01		JAN 17				
			79.01		FEB 17				
			79.01		MAR 17				
			79.01		APR 17				
			79.01		MAY 17				
			79.01		JUN 17				
			79.01		JUL 17				
			79.01		AUG 17				
			79.01		SEP 17				
			79.01		OCT 17				
			79.01						
			79.01						

1264
93881
SUMMONS AND COMPLAINT

Received 16 day of Nov 1966
on 16 day of Nov 1966
I received a copy of the within
William E. Bozeman

by service on
TAYLOR WILKINS, Sheriff
By W. O. Hanner
Sentry

Shall claim 40 miles
Van Camp 4.00
TAYLOR WILKINS, Sheriff
By W. O. Hanner
DEPUTY SHERIFF

GENERAL FINANCE CORPORATION,
An Alabama Corporation,
PLAINTIFF,

VS:

WILLIAM E. BOZEMAN,
DEFENDANT.

FILED
NOV 16 1966
CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA