GE	NERAL FINANCE CORPORATION, Alabama corporation,	X	
	Plaintiff,	χ	IN THE CIRCUIT COURT OF
***************************************	vs.	λ ν	BALDWIN COUNTY, ALABAMA
IS	SAC N. BROWN,	λ ,	AT LAW NO. 7267
	Defendant.	λ.	
		χ	

PLEA:

Comes now the Defendant in the above styled cause by and through his attorney of record and for plea to the Complaint heretofore filed against him in said cause and to each count thereof, separately and severally, says, separately and severally, as follows:

- 1. The allegations of the Complaint are untrue.
- 2. That the debt alleged to be due and owing has been paid by the Defendant.

CHASON, STONE & CHASON

Attorneys for Defendant

The Defendant respectfully requests a trial

of this cause by jury.

Earle Chasa

0AN 28 1967

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 2.2 day

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GENERAL FINANCE CORPORATION, an Alabama corporation,

Plaintiff,

vs.

ISSAC N. BROWN,

Defendant.

PLEA

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JAN 23 BER

AUT L BUCK CLERK

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. BOX 120
BAY MINETTE, ALABAMA

SUMMONS

STATE OF ALABAMA,

BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons ISSAC N. 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 GENERAL FINANCE CORPORATION, An Alabama Corporation.

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

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COMPLAINT

GENERAL FINANCE CORPORATION, an Alabama corporation, IN THE CIRCUIT COURT OF X BALDWIN COUNTY, ALABAMA PLAINTIFF, X VS: AT LAW X CASE NO. 1267 ISSAC N. BROWN, DEFENDANT.

COUNT I

The Plaintiff claims of the Defendant EIGHT HUNDRED TWENTY & 00/100 DOLLARS (\$820.00), due by promissory note, made by him on the 1st day of November, 1965, with interest thereon.

Said note provides for a reasonable attorney's fee, which the Plaintiff elleges to be ONE HUNDRED TWENTY & 00/100 DOLLARS (\$120.00).

COUNT II

The Plaintiff claims of the Defendant EIGHT HUNDRED TWENTY & 00/100 DOLLARS (\$820.00), due from him by account on, to wit: the 1st day of November, 1966, which sum of money, with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant EIGHT HUNDRED TWENTY & 00/100 DOLLARS (\$820.00), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of November, 1966, which sum of money, with interest thereon, is still unpaid.

COUNT IV

The Plaintiff claims of the Defendant BIGHT HUNDRED TWENTY & 00/100 HOULLARS (\$820.00), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of November, 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: Route 2, Box 38 Atmore, Alabama

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

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COUNTY OF Mobile		A Section of the sect
STATE OF Alabama		
Be it remembered, that on this 8th de	y of November	
A. D., 19 66 personally appeared before me, the	undersigned authority,	7
who being duly sworn, upon his oath stated that h	e is Assistant Branch Mar	known to n
of General Finance Corporation of Mobile, 11	19 Springhill Ave. Mobil	le Alahama
a corporation organized and doing business under	er the laws of the State of Al	Labama
and has been duly authorized by said corporation	n to make this affidavit	
a partnership composed of		
***************************************		*******
a sole trader doing business as		**************************************
and that as such he makes this affidavit; that he said General Finance Corporation of Mobile Issac N. Brown of Ro	; that the attache	ed account again Labama
is just and correct, within the knowledge of this	affiant, that the items thereo	n stated and cor
posing the said account were sold and delivered to	o said Issac N. Brown	
[its]		
at { their } special instance and request, that creating his }		
just and lawful offsets to which said account is en	ntitled as thereon stated, and	d that the balan
thereof, amounting to the sum of LIGHT HUNDRED	[WENTY **************	
(\$ 820.00) with interest from None	19	is justly due ar
remains unpaid.		j u
	Roger & Dollen	-
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	

Notary Public

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SUMMONS AND COMPLAINT

GENERAL FINANCE CORPORATION, An Alabama Corporation,

PLAINTIFF,

VS:

Executed This 20th day of Jan. 1967 by Devery a Copy on Dovac H Brown

1. 16 device 17 for 1946

TAYLOR, WILKINS, Short

By Alter Keller

ISAAC N. BROWN,

DEFENDANT,

I I DICK CLEAR

FOREST A. CHRISTIAN FOLEY, ALABAMA