

GENERAL FINANCE CORPORATION,  
an Alabama corporation,

Plaintiff,

vs.

ISSAC N. BROWN,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7267

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

By:

*John Earle Chason*  
Attorneys for Defendant

The Defendant respectfully requests a trial of this cause by jury.

*John Earle Chason*

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 23 day

of January, 1967

*John E. Chason*

**FILED**  
JAN 23 1967  
CLERK  
RECEIVED

1267  
GENERAL FINANCE CORPORATION,  
an Alabama corporation,

Plaintiff,

vs.

ISSAC N. BROWN,

Defendant.

\*\*\*\*\*

PLEA

\*\*\*\*\*

FILED

JAN 23 1967

ALICE J. DUCK, CLERK  
REGISTERED

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 16 day of November, 1966.

Alvin J. Duck  
Clerk

\*\* \*\* \*

COMPLAINT

GENERAL FINANCE CORPORATION,  
an Alabama corporation,

PLAINTIFF,

VS:

ISSAC N. BROWN,

DEFENDANT.

X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7267

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 alleges 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 EIGHT HUNDRED TWENTY & 00/100 DOLLARS (\$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  
Foley, Alabama Attorney for the Plaintiff

FILED  
NOV 16 1966  
CLERK OF DISTRICT COURT  
FEDERAL DISTRICT COURT  
SOUTHERN DISTRICT OF ALABAMA

COUNTY OF Mobile

STATE OF Alabama

Be it remembered, that on this 8th day of November  
A. D., 19 66, 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  
Issac N. Brown of Route 2 Box 38, Atmore, 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 Issac N. Brown

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 EIGHT HUNDRED TWENTY\*\*\*\*\* Dollars  
(\$ 820.00) 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.

[Signature]  
Notary Public

585

1223-3 REV. (8-59) GA.-LA.-TEX.

NOV 16 1966

SUMMONS AND COMPLAINT

16 day of Nov 1966

1 day of 19

and a copy of the within.

Isaac N. Brown

By service on

TAYLOR, WILKINS, Sheriff

By

GENERAL FINANCE CORPORATION,  
An Alabama Corporation,

PLAINTIFF,

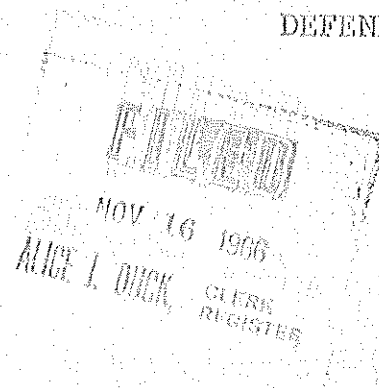
VS:

ISAAC N. BROWN,

DEFENDANT.

Executed this 20th day  
of Jan. 1967 by sewing  
a copy on Isaac N. Brown

Wynne Skiff  
By Alton Keller



LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA