

COPY

FOREST A. CHRISTIAN
ATTORNEY AT LAW
P. O. DRAWER 190
AREA CODE 205 - PHONE 943-2201
FOLEY, ALABAMA 36535

March 11, 1967

Honorable Telfair Mashburn
Judge of Circuit Court
Bay Minette, Alabama 36567

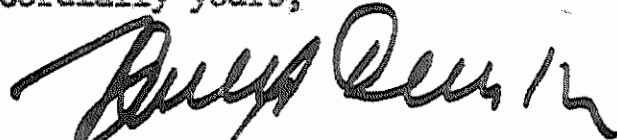
Re: General Finance Corporation
Vs: Curtis C. Burcham, Jr.
Case No. 7351
Vs: William E. Bozeman
Case No. 7266

Dear Judge Mashburn:

Since the Defendant, Curtis C. Burcham, Jr., resides in Escambia County, kindly enter a non-suit and have the clerk send me court costs bill.

Also kindly enter a non-suit in William E. Bozeman case and send court costs bill.

Cordially yours,



FOREST A. CHRISTIAN

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons CURTIS C. BURCHAM, JR., 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 27 day of January, 1967.

Alice S. Luck
Clerk

** ** *

COMPLAINT

GENERAL FINANCE CORPORATION, X
an Alabama corporation, X IN THE CIRCUIT COURT OF
PLAINTIFF, X BALDWIN COUNTY, ALABAMA
VS: X AT LAW
CURTIS C. BURCHAM, JR., X CASE NO. 7357
DEFENDANT. X

COUNT I

The Plaintiff claims of the Defendant SEVEN HUNDRED NINETY-FOUR & 00/100 DOLLARS (\$794.00), due by promissory note made by him on the 14th day of May, 1966, 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 SEVEN HUNDRED NINETY-FOUR & 00/100 DOLLARS (\$794.00), due from him by account on, to wit: the 14th day of May, 1966, which sum of money, with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant SEVEN HUNDRED NINETY-FOUR & 00/100 DOLLARS (\$794.00), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 14th day of May, 1966, which sum of money, with interest thereon, is still unpaid.

COUNT IV

The Plaintiff claims of the Defendant SEVEN HUNDRED NINETY-FOUR & 00/100 DOLLARS (\$794.00), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 14th day of May, 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:
319 Forrest Avenue
Atmore, Alabama

Forest A. Christian
Forest A. Christian, Attorney for the
Plaintiff

Entered 1-30-67
J. S. Byrnes

FILED
JAN 31 1967
CLERK
BALDWIN COUNTY

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
Curtis C. Burcham, Jr. of 319 Forrest Ave., 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 Curtis C. Burcham, Jr.

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 SEVEN HUNDRED NINETY-FOUR * * * * * Dollars
(\$794.00) 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.

Notary Public

567

BRANCH 497		CONTRACT NUMBER 6579		DUE DATE 15		O.C. U		N-U 65		MAKE Pontiac		MODEL Bonneville		STYLE 2Dr. HT		V8		IDENTIFICATION NUMBER 262375X 173599							
NAME-ADDRESS BURCHAM, Curtis C. Jr. 319 Forrest Avenue Atmore, Alabama						SCHEDULE OF COVERAGE A (1) COMPREHENSIVE EXCLUDING COLLISION (2) PERSONAL EFFECTS \$100		LIMITS OF LIAB ACTUAL CASH VALUE		ANNUAL PREM.		EXTENDED PREM.		EXTENDED PREM.		PREMIUM LIFE									
						B COLLISION		ACTUAL CASH VALUE LESS \$ DED		Old Republic Insurance						PREMIUM H & A									
						C FIRE, LIGHTNING & TRANSPORTATION		ACTUAL CASH VALUE																	
						D THEFT		ACTUAL CASH VALUE																	
DATE OF CONTRACT 5-14-66						LAST INSTALMENT DUE 11-15-68		E COMBINED ADD COVERAGE		ACTUAL CASH VALUE															
CO-SIGNER						F TOWING & LABOR		\$ PER DISABLMT																	
						SYM- CL SC		TOTAL																	
						DATE INSURANCE EFFECTIVE		DATE INSURANCE EXPIRES		TOTAL PREMIUM															
NUMBER & AMOUNT OF INSTALMENTS 30 @ 111.00 6-15-66						DEALER NAME AND NO. Auto Bargain Center #2						HOME PHONE				TIME SELLING PRICE									
EMPLOYER & OCCUPATION Scott Paper Co. General Utility												BUSINESS PHONE				CASH DOWN PAYMENT									
						EQUIP.										TRADE DOWN PAYMENT									
DATE PURCHASED 5-16-66						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		INSURANCE											
1 2 3						AMOUNT OF CONTRACT				3330.00		REF		DATE		AMOUNT		BALANCE		1242					
						111.00		1 6-14 JUN 15						8-15		Bal.		3219 00		1241					
						111.00		2 JUL 15						8-15		10 00		3229 00						Ck. for repo expenses	
						111.00		3 AUG 15																	
						111.00		4 SEP 15																	
						111.00		5 OCT 15																	
						111.00		6 NOV 15																	
						111.00		7 DEC 15																	
						111.00		8 JAN 15																	
						111.00		9 FEB 15																	
						111.00		10 MAR 15																	
						111.00		11 APR 15																	
						111.00		12 MAY 15																	
						111.00		13 JUN 15																	
						111.00		14 JUL 15																	
						111.00		15 AUG 15																	
						111.00		16 SEP 15																	
						111.00		17 OCT 15																	
						111.00		18 NOV 15																	
						111.00		19 DEC 15																	
						111.00		20 JAN 15																	
						111.00		21 FEB 15																	
						111.00		22 MAR 15																	
						111.00		23 APR 15																	
						111.00		24 MAY 15																	
						111.00		25 JUN 15																	
						111.00		26 JUL 15																	
						111.00		2																	

BRANCH 497	CONTRACT NUMBER 6579	DUE DATE 15	O.C. U	N-U 65	YEAR Pontiac	MAKE Bonneville	MODEL 2Dr. HT	STYLE V8	IDENTIFICATION NUMBER 262375X 173599
NAME-ADDRESS BURCHAM, Curtis C. Jr. 319 Forrest Avenue Atmore, Alabama			SCHEDULE OF COVERAGE A (1) COMPREHENSIVE EXCLUDING COLLISION (2) PERSONAL EFFECTS \$100		LIMITS OF LIAB ACTUAL CASH VALUE		ANNUAL PREM. EXTENDED PREM. EXTENDED PREM.		PREMIUM LIFE PREMIUM H & A
DATE OF CONTRACT 5-14-66			LAST INSTALMENT DUE 11-15-68		B COLLISION ACTUAL CASH VALUE LESS \$ DED		Cld Republic Insurance		Repossessed 8-15-66 LJV#116
CO-SIGNER			E COMBINED ADD COVERAGE ACTUAL CASH VALUE		D THEFT ACTUAL CASH VALUE		F TOWING & LABOR \$ PER DISADMT		
NUMBER & AMOUNT OF INSTALMENTS 30 @ 111.00 6-15-66			SYM- CL SC TOTAL		DATE INSURANCE EFFECTIVE		DATE INSURANCE EXPIRES TOTAL PREMIUM		
EMPLOYER & OCCUPATION Scott Paper Co. General Utility			DEALER NAME AND NO. Auto Bargain Center #2		HOME PHONE BUSINESS PHONE		TIME SELLING PRICE CASH DOWN PAYMENT TRADE DOWN PAYMENT		
DATE PURCHASED 5-16-66			RATE		TIME EMP.		AGE		M-S
CR. GRADE			APPRAISAL		YARDSTICK		\$ OVER		% DOWN CON. ACT.
AMT. EACH INSTALMENT			DATE PAID		DUE DATE		BALANCE		IRREGULAR REMITTANCES
1	2	3	AMOUNT OF CONTRACT		3330.00		REF		DATE
			111.00	1	6-14	JUN 15		8-15	Bal.
			111.00	2		JUL 15		8-15	10 00
			111.00	3		AUG 15		Repossession Balance	
			111.00	4		SEP 15			
			111.00	5		OCT 15			
			111.00	6		NOV 15			
			111.00	7		DEC 15			
			111.00	8		JAN 15			
			111.00	9		FEB 15			
			111.00	10		MAR 15			
			111.00	11		APR 15			
			111.00	12		MAY 15			
			111.00	13		JUN 15			
			111.00	14		JUL 15			
			111.00	15		AUG 15			
			111.00	16		SEP 15			
			111.00	17		OCT 15			
			111.00	18		NOV 15			
			111.00	19		DEC 15			
			111.00	20		JAN 15			
			111.00	21		FEB 15			
			111.00	22		MAR 15			
			111.00	23		APR 15			
			111.00	24		MAY 15			
			111.00	25		JUN 15			
			111.00	26		JUL 15			
			111.00	27		AUG 15			
			111.00	28		SEP 15			
			111.00	29		OCT 15			
			111.00	30		NOV 15			
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RECEIVED

JAN 27 1967

TAYLOR WILKINS
SHERIFF

7551
SUMMONS AND COMPLAINT

GENERAL FINANCE CORPORATION, an
Alabama corporation,

PLAINTIFF,

VS:

CURTIS C. BURCHAM, JR.,

DEFENDANT.

FILED

JAN 27 1967

ALICE A. DUCK, CLERK
REGISTRY

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

Executed this 20th day
of January 1967
at Foley, Alabama
by
C. C. Burcham, Jr.
on behalf of
General Finance Corporation
SHERIFF

PLEA IN ABATEMENT

COMPLAINT

GENERAL FINANCE CORPORATION,
an Alabama Corporation,

X
X

PLAINTIFF,

X

VS:

X

CURTIS C. BURCHAM, JR.,

X

DEFENDANT

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. _____

Comes now the defendant, Curtis C. Burcham, Jr. and appears specially for the purpose of filing the following plea in abatement to the complaint filed in this cause and to each and every court thereof separately and severally and for no other purpose. This court is without jurisdiction of this cause of action in that the respondent Curtis C. Burcham, Jr. is a resident citizen of Escambia County, Alabama, and has never lived in Baldwin County, Alabama.

The transaction which is basis of this suit was consummated in either Escambia County or Mobile County, hence this court is without jurisdiction and the defendant requests that this matter be abated.

Curtis C. Burcham Jr

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Curtis C. Burcham, Jr., who is known to me and who after being by me first duly sworn, deposes and says: That he has read the foregoing instrument and that the facts contained therein are true and correct.

S. C. Burcham Jr
Curtis C. Burcham, Jr.

Sworn to and subscribed before me on this the 7 day of February, 1967.

S. C. Burcham Jr
Notary Public, State of Alabama at Large

FILED
FEB 8 1967
ALICE L. DICK, CLERK
RECEIVED

STATE OF ALABAMA
BALDWIN COUNTY

I, Tolbert M. Brantley, hereby certify that I have mailed
a copy of the foregoing Plea in Abatement postage prepaid to Mr.
Forest A. Christian, Attorney at Law, Foley, Alabama, on this the
2 day of February, 1967.

Tolbert M. Brantley
Tolbert M. Brantley

Without waiving the foregoing Plea in Abatement, the
Respondent, Curtis C. Burcham, Jr., comes now and demands a trial
by jury.

WILTERS & BRANTLEY

BY: Tolbert M. Brantley
Attorney for the Respondent,
Curtis C. Burcham, Jr.

7351
PLEA IN ABATEMENT

GENERAL FINANCE CORPORATION,
an Alabama Corporation,

PLAINTIFF,

VS:

CURTIS C. BURCHAM, JR.,

DEFENDANT

PLEA IN ABATEMENT

COMPLAINT

GENERAL FINANCE CORPORATION	X	
an Alabama Corporation,	X	
	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:	X	
		AT LAW
CURTIS C. BURCHAM, JR.,	X	
		CASE NO. 7351
DEFENDANT	X	

Comes now the defendant, Curtis C. Burcham, Jr. and appears specially for the purpose of filing the following plea in abatement to the complaint filed in this cause and to each and every court thereof separately and severally and for no other purpose. This court is without jurisdiction of this cause of action in that the respondent Curtis C. Burcham, Jr. is a resident citizen of Escambia County, Alabama, and has never lived in Baldwin County, Alabama.

The transaction which is basis of this suit was consummated in either Escambia County or Mobile County, hence this court is without jurisdiction and the defendant requests that this matter be abated.

X Curtis C. Burcham Jr
Curtis C. Burcham, Jr.

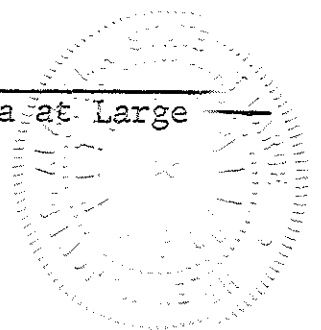
STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Curtis C. Burcham, Jr., who is known to me and who after being by me first duly sworn, deposes and says: That he has read the foregoing instrument and that the facts contained therein are true and correct.

X Curtis C. Burcham Jr
Curtis C. Burcham, Jr.

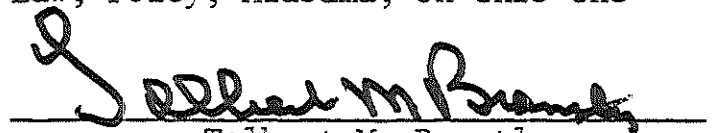
Sworn to and subscribed before me on this the 13th day of February, 1967.

Helen M. Jones
Notary Public, State of Alabama at Large
My Commission Expires Oct. 21, 1969



STATE OF ALABAMA
BALDWIN COUNTY

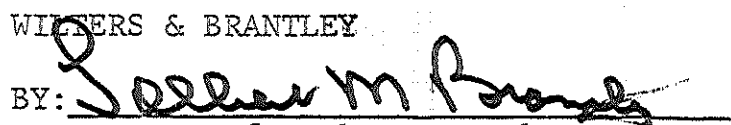
I, Tolbert M. Brantley, hereby certify that I have mailed a copy of the foregoing Plea in Abatement postage prepaid to Mr. Forest A. Christian, Attorney at Law, Foley, Alabama, on this the 13 day of February, 1967.


Tolbert M. Brantley

Without waiving the foregoing Plea in Abatement, the Respondent, Curtis C. Burcham, Jr., comes now and demands a trial by jury.

WILKERS & BRANTLEY

BY:


Attorney for the Respondent,
Curtis C. Burcham, Jr.

FILED
FEB 14 1967
ALICE J. DICK, CLERK
REGISTER

7051
July
PLEA IN ABATEMENT

GENERAL FINANCE CORPORATION
an Alabama Corporation

PLAINTIFF,

VS.

CURTIS C. BURCHAM, JR.,

DEFENDANT