

August 28, 1967

Mrs. Alice J. Duck, Circuit Clerk  
Baldwin County Court House  
Bay Minette, Alabama

RE: Jobs Unlimited, Inc., a Corp.

VS

Billy G. Ragsdale  
Case No. 58073

Dear Mrs. Duck,

As provided by Act No. 76, Acts of Alabama, 1961, I am enclosing the following papers in the above styled case:

No. 1	Complaint and Summons
No. 2	Sheriff's Return on Complaint and Summons
No. 3	Plea in Abatement
No. 4	Certified Copy of Docket Sheet
No. 5	Cost Bill
No. 6	Notice of Transfer

Will you please acknowledge receipt of the above papers in the bottom of this letter and return to me in the enclosed self-addressed, stamped envelope.

Thank you for your cooperation.

Yours very truly,

*J. D. Richardson*  
J. D. Richardson, Clerk

All papers in this cause received in The Circuit Court of Baldwin County, Alabama, this the 29 day of Aug, 1967.

*Alice J. Duck*  
Clerk of The Circuit Court of Baldwin  
County, Alabama.

# COST BILL

THE STATE OF ALABAMA }  
MOBILE COUNTY }

The Court of General Sessions  
of Mobile County

*John W. Hinton, Jr.*  
*Brady S. Reynolds*

Plaintiff

Defendant

CASE NO. *58073*

## COURT FEES

Summons and proceedings thereon to judgment .....	\$1.00	<i>1.00</i>
Docketing each cause .....	.10	<i>.10</i>
Attachment Bond and Affidavit .....	1.50	
Issuing each Attachment .....	.50	
Summoning Garnishee and taking examination .....	.75	
Subpoena for each witness .....	.15	
Execution and taxing costs thereon .....	.50	
Each appeal or certiorari, including bond and certificate of proceedings .....	1.00	<i>1.50</i>
Every necessary Certificate or Notice not otherwise provided for .....	.25	<i>.25</i>
For issuing each Writ of Detinue .....	.50	
For each Scire Facias, or notice in the nature thereof .....	.50	
Every other Bond .....	.50	
Administering an oath and certifying the same .....	.25	
Issuing Notice of Appeal .....	.25	
Law Library Fee .....	1.00	<i>1.00</i>
Judgment Ni Si against Garnishee .....	.50	
Writ of Discovery .....	.50	
Writ of Contempt .....	.50	
Writ of Arrest .....	.50	
Alias Summons .....	1.00	
Witness Fee fifty cents for each day's attendance .....		
.....		
.....		
.....		
.....		
.....		
.....		
TOTAL .....	\$	<i>3.35</i>

## SHERIFF'S FEES

Levying Attachment .....	6.00	
Entering and returning same .....	.25	
Summoning Garnishee and making return .....	1.50	
Serving Summons and other mesne process, and returning the same .....	1.50	<i>1.50</i>
Summoning each Witness and returning Subpoena .....	.75	
Collecting execution for costs only .....	1.50	
Serving Scire Facias or other like notice .....	1.50	
Serving any summons not herein provided for, and making return .....	1.50	<i>1.50</i>
Seizing personal property under Writ of Detinue .....	6.00	
Taking care of such property, such just compensation as Court may fix .....		
Taking and approving bonds of every kind .....	2.00	
When property is sold under execution or attachment .....		
Commission: .....	5%	
When sale is stayed by restraining order .....	2½%	<i>6.00</i>
Total .....	\$	<i>9.00</i>
GRAND TOTAL .....	\$	<i>12.35</i>

I respectfully call your attention to the above Court Cost Bill which if not paid by  
19....., it will be my unpleasant duty to issue execution on your property for the recovery of the same.

G. V. ADAMS, Clerk.

*G. V. Adams*

JOB'S UNLIMITED, INC.,  
A Corporation,

Plaintiff,

vs.

BILLY G. RAGSDALE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. \_\_\_\_\_

Comes now the Defendant in the above styled cause and by and through their attorneys, Wilters, Brantley & Nesbit enters an appearance in this action which was commenced in the General Sessions Court of Mobile County, Alabama, to which they have filed a plea in abatement to the jurisdiction of the said court.

WILTERS, BRANTLEY & NESBIT

BY: Phyllis S. Nesbit

The Defendant demands a trial by jury.

WILTERS, BRANTLEY & NESBIT

BY: Phyllis S. Nesbit

#### CERTIFICATE OF SERVICE

I do hereby certify that I have on this 30 day of June 1967, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By: Phyllis S. Nesbit

FILED  
JUN 29 1967  
CLERK  
REGISTER

THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

Case No. 58073

JOBS UNLIMITED, INC.,	:	Filed:	June 2, 1967
a Corporation;	:		
	:	Summons issued:	June 12, 1967
Plaintiff,	:		
	:	Returnable:	July 12, 1967
	:		
VS	:	Service Had:	June 22, 1967
	:		
	:	Cause of Action:	Complaint and Summons
BILLY G. RAGSDALE,	:		
	:	Attorney for Plaintiff:	Gibbons and Stokes
Defendant.	:		
	:		
Amount of Claim: \$218.72	:	Attorney for Defendant:	Wilters, Brantley & Nesbit

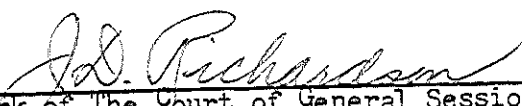
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6/28/67 - Defendant's Pleain Abatement Filed

7/12/67 - Plea in Abatement confessed by Pltff. - & transfer to Baldwin County  
Paul W. Brunson

I hereby certify that the foregoing is a true and correct copy of the above styled cause, as it appears on record and in the files of The Court of General Sessions of Mobile County, Alabama.

Witness my hand this the 28th day of August, 1967.

  
Clerk of The Court of General Sessions of Mobile County

TRANSFER

NOTICE of ~~APPEAL~~STATE OF ALABAMA,  
MOBILE COUNTY

JOBS UNLIMITED, INC., A CORP.

Plaintiff

VS.

BILLY G. RAGSDALE

Defendant

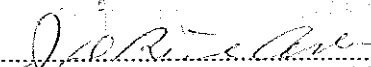
To BILLY G. RAGSDALE, the defendant

in said Cause:

You are hereby notified that JOBS UNLIMITED, INC., A CORP.

the plaintiff in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, from the COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having complied with the requirements of the law in such cases made and provided, the same has been granted to the next term of the CIRCUIT COURT of Baldwin County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 28 day of August 19 67.

  
 Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 58073

JOSS UNLIMITED, INC., A CORP.

Plaintiff,

VS

BILLY G. RAGSDALE

Defendant.

NOTICE OF APPEAL TRANSFER

Returnable To The Circuit Court  
of Baldwin County

Issued: August 28, 1967

Serve On: Billy G. Ragsdale  
P. O. Box 27  
Silverhill (Baldwin County) Ala.

Not Found

REC'D SHERIFF DEPT.  
MOBILE COUNTY, ALA.

AUG 29 10 24 AM '67

BY \_\_\_\_\_

REC'D SHERIFF DEPT.  
MOBILE COUNTY, ALA.

SEP 20 9 38 AM '67

BY \_\_\_\_\_

Received 10 day of Sept 1967

at on day of 19

and a copy of the within Notice of Transfer  
Billy G. Ragsdale

service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By \_\_\_\_\_ D. S.

Returned 18 day of Sept 1967

Not found in my county after diligent search and In-  
quiry.

Taylor Wilkins, Sheriff

By Charles Chidress

Deputy Sheriff

TRANSFER

NOTICE of ~~APPEAL~~STATE OF ALABAMA,  
MOBILE COUNTYJOBS UNLIMITED, INC., A CORP.,  
Plaintiff  
VS.

BILLY G. RAGSDALE

Defendant

To BILLY G. RAGSDALE, the defendant

in said Cause:

You are hereby notified that JOBS UNLIMITED, INC., A CORP.

the plaintiff in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, from the Judge of the COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having complied with the requirements of the law in such cases made and provided, the same has been granted to the next term of the CIRCUIT COURT of Baldwin County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 28 day of August 19 67

*J. P. Ragdale*  
Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 58073

JOBS UNLIMITED, INC., A CORP.

Plaintiff,

VS

BILLY G. RAGSDALE

Defendant.

NOTICE OF ~~ARREST~~ TRANSFER

Returnable To The Circuit Court  
of Baldwin County

Issued: August 28, 1967

Serve On: Billy G. Ragsdale  
P. O. Box 27  
Silverhill (Baldwin County) Ala.

REC'D SHERIFF DEPT.  
MOBILE COUNTY, ALA.

AUG 29 10 24 AM '67

BY \_\_\_\_\_



TRANSFER

NOTICE of ~~APPEAL~~

STATE OF ALABAMA, }  
MOBILE COUNTY }

JOBS UNLIMITED, INC., A CORP. ....  
Plaintiff  
VS.

BILLY G. RAGSDALE .....  
Defendant

To ~~BILLY G. RAGSDALE, the defendant~~ .....

in said Cause:

You are hereby notified that JOBS UNLIMITED, INC., A CORP. ....

the plaintiff ..... in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, ~~an appeal from the judgment therein rendered by~~ ..... from the ~~Judge of the~~ COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having complied with the requirements of the law in such cases made and provided, the same has been granted to the next term of the CIRCUIT COURT of ~~Mobile~~ Baldwin County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 28 day of August 19 67.

*J. D. Richardson*  
Clerk, Court of General Sessions of Mobile County, Civil Division

(6)  
Case No. 58073

NO. 7707

JOBS UNLIMITED, INC., A CORP.

Plaintiff,

VS

BILLY G. RAGSDALE

Defendant.

NOTICE OF ~~ARREST~~ TRANSFER

Returnable To The Circuit Court  
of Baldwin County

Issued: August 28, 1967

Serve On: Billy G. Ragsdale  
P. O. Box 27  
Silverhill (Baldwin County) Ala.

JOBS UNLIMITED, INC.,  
A Corporation,

Plaintiff,

vs.

BILLY G. RAGSDALE,

Defendant.

IN THE GENERAL SESSIONS COURT

MOBILE COUNTY, ALABAMA

AT LAW

NO. 58073

VERIFIED PLEA IN ABATEMENT

Comes now the Defendant, Billy G. Ragsdale, resident citizen of Baldwin County, Alabama, residing in Silverhill, Alabama, and files this, his special plea to the jurisdiction of this Court in the above styled cause, to the complaint filed against them by the Plaintiff on, to-wit the 12th day of June, 1967, and says that, the Plaintiff cannot maintain said cause against him in this Court. the Defendant enters this plea in said cause for the only and sole purpose of pleading to the jurisdiction of this court.

Billy G. Ragsdale  
Billy G. Ragsdale

STATE OF ALABAMA

BALDWIN COUNTY

Before me Harry J. Wilters Jr., a Notary Public, in and for said County in said State, personally appeared Billy G. Ragsdale, who having been by me first duly sworn, deposes and says that he has read the foregoing plea in abatement and that the facts stated therein are true.

Billy G. Ragsdale

Sworn to and subscribed before me on this the 27<sup>th</sup> day of June, 1967.

Harry J. Wilters Jr.  
Notary Public  
State of Alabama  
at Large

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 27<sup>th</sup> day of June, 1967, served a copy of the foregoing pleading on each of the parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By: Harry J. Wilters Jr.

6/28/67  
FILED

AUG 29 1967

ALICE J. DUCK  
CLERK  
REGISTER

## COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS  
COURTROOM "B" FIRST FLOORThe State of Alabama,  
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

BILLY G. RAGSDALE

You are hereby commanded to summon.....

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile County, on the 12 day of July, 1967 at the hour of 9:00 A.M., then and there to answer a complaint of JOBS UNLIMITED, INC., a corporation

of a debt or other demand not exceeding Seven Hundred Fifty Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this 12 day of June, 1967

W. Lewis  
Clerk of the Court of General Sessions of Mobile County.

Cause of Action, Plaintiff claims of the Defendant \$164.04

due by ~~written contract~~ with interest thereon executed by him on 7/2/67 under which he waived all exemptions under the laws of Alabama and agreed to pay a reasonable attorney's fee, which is claimed in the amount of \$

B. F. Stephens III  
ATTORNEY FOR PLAINTIFF

78

①  
**COMPLAINT AND SUMMONS**

Atty. for Plaintiff:  
Atty. for Defendant: **GIBBONS & STOKES**

**THE COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY**

No. 58053

Ret. July 12, 1967

**JOBS UNLIMITED, INC., a corp.,**  
Plaintiff  
**BILLY G. RAGSDALE,**  
Defendant

Continued To

*Sheriff's Return*  
**RECEIVED**

JUN 2 1 1967

**TAYLOR WILKINS**  
SHERIFF

Executed by Service on

Billy G. Ragdale  
Defendant

This 22 day June, 1967

Sheriff of Mobile County

By Carlisle Childers  
Deputy Sheriff

*J. Hill*

REC'D SHERIFF DEP  
MOBILE COUNTY, ALA

JUN 13 1 42 PM '67

BY

Please forward to the Sheriff of  
Baldwin County, Alabama, for  
service upon the defendant at  
P. O. Box 27, Silverhill, Ala.

Sheriff claims 60 miles at  
Ten Cents per mile Total \$ 6.00

**TAYLOR WILKINS, Sheriff**  
BY Carlisle Childers  
DEPUTY SHERIFF

## COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS  
COURTROOM "B" FIRST FLOORThe State of Alabama,  
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon BILLY G. RAGSDALEto be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile  
County, on the 12 day of July, 1967 at the hour of 9:00 A.M.,  
then and there to answer a complaint of JOBS UNLIMITED, INC., a corporation

of a debt or other demand not exceeding Seven Hundred Fifty Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this 12 day of July, 1967[Signature]  
Clerk of the Court of General Sessions of Mobile County.

Cause of Action, Plaintiff claims of the Defendant \$164.04

due by written contract, with interest thereon exe-  
cuted by him on 1/16/67 under which he  
waived all exemptions under the laws of Alabama  
and agreed to pay a reasonable attorney's fee, which  
is claimed in the amount of \$ 54.68[Signature]  
ATTORNEY FOR PLAINTIFF

JUN 2 1967

COMPLAINT AND SUMMONS

Atty. for Plaintiff: GIBBONS & STOKES  
Atty. for Defendant:

THE COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY

No. 58073

Ret.

July 12, 1967

JOBS UNLIMITED, INC., a corp.,  
Plaintiff  
VS.  
BILLY G. RAGSDALE,  
Defendant

Continued To

Executed by Service on

Defendant

This ..... day ....., 19.....

Sheriff of Mobile County

By

Deputy Sheriff

Please forward to the Sheriff of  
Baldwin County, Alabama, for  
service upon the defendant at  
P. O. Box 27, Silverhill, Ala.

JOBS UNLIMITED, INC.,  
a corporation

Plaintiff

VS

BILLY G. RAGSDALE

Defendant

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW

)  
) Case No. 7707  
)

MOTION TO WITHDRAW

Comes now B. F. Stokes, III and moves the Court to allow him to withdraw as attorney of record for the plaintiff. Movant would further show unto the Court that he has notified the plaintiff in writing of his intention to withdraw.

B. F. Stokes, III  
B. F. Stokes, III

CERTIFICATE OF SERVICE

I certify that on this 30 day of Apr, 1968, a copy of the foregoing pleading has been served upon counsel for all adverse parties to this proceeding by mailing the same to each by first class U. S. mail, properly addressed and postage prepaid.

B. F. Stokes, III  
ATTORNEY FOR plaintiff

FILED

MAY 10 1968

ALICE J. DUCK  
CLERK  
REGISTER