

GORDON, CLEVELAND & CHANCEY
ATTORNEYS AND TAX CONSULTANTS

ROBERT S. GORDON
CHARLES CLEVELAND
BRYAN A. CHANCEY

BRUCE L. GORDON
ERRANTE CORINA
TOMMY E. HILL

FIFTEENTH FLOOR
CITY NATIONAL BANK BUILDING
BIRMINGHAM, ALABAMA 35203
TELEPHONE 328-0640

September 13, 1967

Miss Alice J. Duck, Register
Circuit Court- Baldwin County
Bay Minette, Alabama

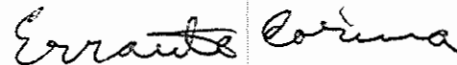
Re: United States Finance Co., Inc.
a Fla. Corp.
vs: John Henry Ladd aka Henry Ladd
& Emma Ladd
Case # 7726

Dear Miss Duck:

Thank you for your letter of September 8th
requesting security for costs.

Enclosed please find the requested security
certified as to sufficiency for this county. I hope that
it will be sufficient in your county with this certificate.

Sincerely



Errante Corina
for: Gordon, Cleveland & Chancey

EC:jl
encl.

GORDON, CLEVELAND & CHANCEY
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BIRMINGHAM, ALABAMA 35203
TELEPHONE 328-0640

August 31, 1967

Clerk, Circuit Court
Baldwin County Court House
Bay Minette, Alabama

Re: United States Finance Co., Inc.
vs: John Henry Ladd, et al

Dear Sir:

7726

Please file the enclosed bill in your court
and stamp the extra copy as filed.

I would appreciate your returning it to this
office at your convenience.

Sincerely

Errante Corina

Errante Corina
for: Gordon, Cleveland & Chancey

EC:jl
encl.

A

September 8, 1967

Gordon, Cleveland & Chancey
Attorneys at Law
15th Floor City National Bank Building
Birmingham, Alabama 36203

Re: United States Finance Co., Inc.
a Fla. Corp.
vs: John Henry Ladd a/k/a Henry Ladd
& Emma Ladd

Gentlemen:

This will acknowledge receipt of the Summons and Complaint
in the above style cause, same has been filed and given number
7726.

You failed to include the security for cost, which is required
for out of State cases filed in this court, this amount should be
around \$30.00.

Yours very truly,

Clerk of the Circuit Court
Baldwin County, Alabama

AJD/eb

UNITED STATES FINANCE COMPANY, INC.)	
a Florida Corporation)	
PLAINTIFF)	CIRCUIT COURT OF BALDWIN COUNTY
VS)	TWENTY EIGHTH JUDICIAL CIRCUIT
JOHN HENRY LADD AKA HENRY LADD)	
AND EMMA LADD)	
DEFENDANTS)	CASE NUMBER <u>7726</u>

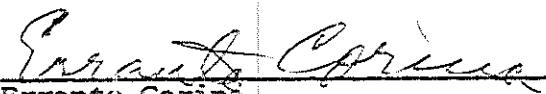
MOTION TO STRIKE PARTY DEFENDANT AND FOR DEFAULT JUDGMENT

Comes the plaintiff in the above-styled cause and strikes John Henry Ladd AKA Henry Ladd as a party defendant and moves the court to enter a judgment by default against Emma Ladd, and for grounds for said motion shows unto the court as follows:

1. That John Henry Ladd, also known as Henry Ladd, is deceased and is therefore not in possession of the property which is the subject of this cause.
2. That service of the summons and complaint was had on defendant Emma Ladd on the 9th day of September, 1967.
3. That more than thirty days have passed since the service of a copy of said summons and complaint upon the said defendant, Emma Ladd, and said defendant has failed to file a plea, answer or demurrer to same as required by law.

The premises considered, plaintiff prays that this honorable court will enter a judgment by default in favor of the plaintiff and against the defendant, Emma Ladd, for possession of the property described in the complaint and for damages for the detention thereof in the amount of Five Hundred and No/1.00 Dollars, being the reasonable value of the rental of same for the period June 1, 1967, to the present.

Plaintiff prays for such other relief to which it is entitled.


 Errante Corina
 Attorney for Plaintiff
 15th Fl. City National Bank Bldg.
 Birmingham, Alabama 35203

Plaintiff: c/o 15th Fl. City National Bank Bldg., Birmingham, Ala.
 Defendant: 225 Engleside, Fairhope, Alabama

UNITED STATES FINANCE COMPANY, INC.)
a Florida Corporation)

PLAINTIFF

VS

JOHN HENRY LADD AKA HENRY LADD
AND EMMA LADD

DEFENDANTS

CIRCUIT COURT OF BALDWIN COUNTY

TWENTY EIGHTH JUDICIAL CIRCUIT

CASE NUMBER 7726

SUMMONS

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETING:

You are hereby commanded to summon John Henry Ladd aka Henry Ladd and Emma Ladd, to appear before the Circuit Court at the place of holding same within thirty days from service of this process, then and there to answer the complaint of The United States Finance Company, Inc., a Florida Corporation.

Witness my hand this 7th day of Sept. , 1967.

Alice J. Duck
Clerk

COMPLAINT

The plaintiff sues to recover possession of the following tract of land:

The Northeast corner of the Southwest quarter of Southeast quarter of the Fractional Section 17, Township 6 South, Range 2E, run South 160 feet for point of beginning; run thence South 89 degrees 45 minutes West 70 feet; thence South 72 feet; North 89 degrees 45 minutes East 70 feet; thence North 72 feet to point of beginning, containing one-eighth an acre, more or less,

to the immediate possession of which the plaintiff is entitled by virtue of the purchase of said land at a sale of same on a foreclosure of a mortgage, and which the defendant, after the termination of his possessory interest, and after the plaintiff's demand in writing therefor, unlawfully detains, together with One Thousand Dollars (\$1,000.00) for the detention thereof.

GORDON, CLEVELAND & CHANCEY

By:

Errante Corina
Errante Corina

Attorneys for Plaintiff

15th Fl. City National Bank Bldg.
Birmingham, Alabama 35203

Plaintiff: c/o 15th Fl. City National Bank Bldg., Birmingham, Ala.

Defendants: 225 Engleside, Fairhope, Alabama

FILED

SEP 7 1967

577

ALICE J. DUCK

CLERK
REGISTER

The State of Alabama,
~~JEFFERSON~~ COUNTY.

CIRCUIT COURT
~~Tenth~~ Judicial Circuit of Alabama
TWENTY EIGHTH

United States Finance Company, Inc.

a Florida Corporation

No. 7726

vs. Plaintiff.....

John Henry Ladd aka Henry Ladd and

Emma Ladd

Defendant.....

SECURITY FOR COSTS IN
CIRCUIT COURT

We hereby acknowledge ourselves security for all costs in the Circuit Court in the above case, returnable to the present term thereof. And for the payment of the above bond, we hereby waive our right of exemption to personal property under the Constitution and Laws of the State of Alabama.

I hereby certify that if this security for costs were presented to me, Clerk of the Circuit Court, Tenth Judicial Circuit, Jefferson County, Alabama, I would approve it as being good and sufficient.

Julian Swift Clerk.

United States Finance Company, Inc. a Fla. Corp. (L. S.)

By: *Ernesta Corina* (L. S.)

Robert S. Gordon (L. S.)

Charles Cleveland (L. S.)

Charles Cleveland

Take and approved this the 14 day of Sept 1967

Elaine French Circuit Clerk.

No. 7726

The State of Alabama,
BALDWIN ~~JEFFERSON~~ COUNTY.

**SECURITY FOR COSTS IN
CIRCUIT COURT**

United States Finance Company, Inc.
a Florida Corporation

c/o 15th Fl. City Nat'l Bank Bldg
Birmingham, Alabama
vs.

Plaintiff.

John Henry Ladd aka Henry Ladd

and Emma Ladd

225 Engleside, Fairhope, Ala

Defendant.

UNITED STATES FINANCE COMPANY, INC.)
a Florida Corporation)

PLAINTIFF)

VS)

JOHN HENRY LADD AKA HENRY LADD)
AND EMMA LADD)

DEFENDANTS)

CIRCUIT COURT OF BALDWIN COUNTY

TWENTY EIGHTH JUDICIAL CIRCUIT

CASE NUMBER

7726

SUMMONS

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to summon John Henry Ladd aka Henry Ladd and Emma Ladd, to appear before the Circuit Court at the place of holding same within thirty days from service of this process, then and there to answer the complaint of The United States Finance Company, Inc., a Florida Corporation.

Witness my hand this 7th day of Sept., 1967.

Alice J. Duck
Clerk

COMPLAINT

The plaintiff sues to recover possession of the following tract of land:

The Northeast corner of the Southwest quarter of Southeast quarter of the Fractional Section 17, Township 6 South, Range 2E, run South 160 feet for point of beginning; run thence South 89 degrees 45 minutes West 70 feet; thence South 72 feet; North 89 degrees 45 minutes East 70 feet; thence North 72 feet to point of beginning, containing one-eighth an acre, more or less,

to the immediate possession of which the plaintiff is entitled by virtue of the purchase of said land at a sale of same on a foreclosure of a mortgage, and which the defendant, after the termination of his possessory interest, and after the plaintiff's demand in writing therefor, unlawfully detains, together with One Thousand Dollars (\$1,000.00) for the detention thereof.

GORDON, CLEVELAND & CHANCEY

By: Errante Corina

Errante Corina

Attorneys for Plaintiff

15th Fl. City National Bank Bldg.
Birmingham, Alabama 35203

Plaintiff: c/o 15th Fl. City National Bank Bldg., Birmingham, Ala.

Defendants: 225 Engleside, Fairhope, Alabama

FILED

SEP 7 1967

ALICE J. DUCK

CLERK
REGISTER

CASE NO. 7726

UNITED STATES FINANCE COMPANY, INC.
A Florida Corporation,

Plaintiff,

vs:

JOHN HENRY LADD, a/k/a HENRY LADD
AND EMMA LADD,

Defendants

SUMMONS & COMPANY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, CASE NO. 7726

Gordan, Cleveland & Chancey
Attorneys at Law
15th Floor, City National Bank Bldg.
Birmingham, Alabama 35203

Received 7 day of Sept 1967
and on 9 day of Sept 1967
I served a copy of the within 846
on John Henry Ladd &
Emma Ladd
By service on Emma Ladd (Hope)

TAYLOR WILKINS, Sheriff
By Roy Randall D.S.

John Henry Ladd
Passed away

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Roy Randall
DEPUTY SHERIFF

GORDON, CLEVELAND AND CHANCEY
ATTORNEYS AT LAW

ROBERT S. GORDON
CHARLES CLEVELAND
BRYAN A. CHANCEY

BRUCE L. GORDON
ERRANTE CORINA
TOMMY E. HILL

FIFTEENTH FLOOR
CITY NATIONAL BANK BUILDING
BIRMINGHAM, ALABAMA 35203
TELEPHONE 328-0640

January 8, 1968

Hon. Telfair J. Mashburn, Judge
Circuit Court, Baldwin County
Bay Minette, Alabama

Re: U.S. Finance vs Henry Ladd
Case # 7726

Dear Judge Mashburn:

After receiving your note advising me of the death of one of the defendants in the above case and suggesting that I take proper action, I have decided that I wish to strike John Henry Ladd aka Henry Ladd as a party defendant and then to move for a default judgment against Emma Ladd. Attached hereto please find a written motion.

I would appreciate very much your considering my motion and entering a judgment by default if it is at all possible for you to do so without any proof of reasonable rental value. If you will require some proof of rental value, I would appreciate a judgment by default for possession at the present time with leave to prove damages, or if you will require said proof before entering any judgment for damages I think I would be inclined to just waive the damages and have you enter a judgment by default for possession with a nominal \$1.00 (One dollar) for damages. I think this would be cheaper on my client than for me to make a trip just for the proof of damages.

I will leave this to your good discretion and will be very happy to have your clerk send me a certificate of the judgment which you enter, with the cost for said certificate. Your cooperation and assistance in this matter is greatly appreciated.

Sincerely

Errante Corina
Errante Corina

for: Gordon, Cleveland & Chancey

EC:jl
encl.

Atlanta, Georgia
Attorney for Plaintiff
15th Fl. City National Bank Bldg.
Birmingham, Alabama 35203

Erizante Colina

demurrer to same as required by law.

The premises considered, plaintiff prays that this honor-
able court will enter a judgment by default in favor of the plaintiff
and against the defendant, Emma Ladd, for possession of the property
described in the complaint and for damages for the detention thereof
in the amount of Five Hundred and No/100 Dollars, being the reasonable
value of the rental of same for the period June 1, 1967, to the present.
Plaintiff prays for such other relief to which it is en-

grounds for said motion shows unto the court as follows:

1. That John Henry Ladd, also known as Henry Ladd, is deceased and is therefore not in possession of the property which is the subject of this cause.
2. That service of the summons and complaint was had on

Comes the plaintiff in the above-styled cause and strikes John Henry Ladd AKA Henry Ladd as a party defendant and moves the court to enter a judgment by default against Emma Ladd, and for grounds for said motion shows unto the court as follows:

MOTION TO STRIKE PARTY DEFENDANT AND FOR DEFAULT JUDGMENT

CASE NUMBER	7726
TWENTY EIGHTH JUDICIAL CIRCUIT	
CIRCUIT COURT OF BALDWIN COUNTY	
PLAINTIFF	US
UNITED STATES FINANCE COMPANY, INC. a Florida Corporation	JOHN HENRY LADD AKA HENRY LADD AND EMMA LADD
DEFENDANTS	