

STATE OF ALABAMA

ELMORE COUNTY

RE: EUGENE INGRAM, doing
business as Gulf Shores
Motel, Inc.

Plaintiff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

No. 7727

Vs.

WESLEY D. ADAMS a/k/a
DEE ADAMS, a/k/a
W.D. ADAMS

PLEA IN ABATEMENT

Comes the defendant in the above styled cause, appearing specially and only for the purpose of filing this plea, and says that the said Eugene Ingram, the plaintiff in said cause ought not to have and maintain his action herein for the defendant says, separately and severally, as follows to wit:

First. Defendant Wesley D. Adams, is a non resident of the County of Baldwin, Alabama. The resident of said defendant is Tallassee, Elmore County, Alabama.

Second. Defendant states his residence was known to said plaintiff at time complaint was issued. Defendant has not been a resident of any other County in the State of Alabama, other than Elmore County, Alabama, for the past two years or more.

Wherefore, defendant says that the Circuit Court of Baldwin County, Alabama, is without jurisdiction to try and determine this cause, and that this action should be abated, and prays the judgment of this Honorable Court whether the plaintiff should be allowed to further maintain this suit.

Wesley D. Adams
Defendant
[Signature]
Attorney for Defendant

FILED

APR 15 1968

STATE OF ALABAMA

ELMORE COUNTY

ALICE J. [Signature] CLERK
REGISTER

Before me, ~~the undersigned Notary Public~~ A/Drew Redden, a Notary Public for the State of Alabama at Large, personally appeared Wesley D. Adams, known to me, and by me being first duly sworn, deposes and says on oath, that he is the defendant in the above entitled cause, and has personal knowledge of the facts stated in the foregoing plea and that the said statement of facts contained therein are true.

Sworn and subscribed before me this 10 day of April, 1968

Wesley D. Adams
Notary Public. Elmore County, Alabama

EUGENE INGRAM, doing
business as Gulf Shores
Motel, Inc.

Plaintiff

VS.

WESLEY D. ADAMS a/k/a
DEE ADAMS, a/k/a
W. D. ADAMS,
Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2227

1.

The Plaintiff claims of the Defendant the sum of TWELVE HUNDRED DOLLARS (\$1,200.00) damages for that heretofore, on to wit, the 24th day of May, 1967, the Defendant entered into a rental agreement with the Plaintiff of two units of a motel located on Lots 15 and 16, Block 8, unit One of Gulf Shores, Alabama; that the Defendant entered into possession of said property soon thereafter, that the defendant invited many friends and acquaintances to visit with him on the aforesaid premises; that the Defendant knew or should have known, that they were prone to be malicious and destructive. The Plaintiff avers that the aforesaid friends of the defendant destroyed the following items of personal property in the premises and did the following damages to the real property to-wit: Several air conditioners were damaged, a double bed torn apart, doors torn off of their hinges and destroyed, a floor torn up, ceilings torn down, window screens torn out, aluminum awings bent and twisted. The aforesaid acts being the direct and proximate result of the Defendant's negligence in inviting and keeping his friends on and in said premises, hence this suit.

WILTERS, BRANTLEY & NESBITT

By: *Hyllus S. Nesbitt*

FILED

SEP 7 1967

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Wesley D. Adams a/k/a Dee Adams,
..... a/k/a W. D. Adams

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, State of Alabama, at Bay Minette, against.....

..... Wesley D. Adams a/k/a Dee Adams a/k/a W. D. Adams, Defendant.....

by Eugene Ingram, doing business as Gulf Shores Motel, Inc.

....., Plaintiff.....

Witness my hand this..... 7th day of West. 19 67

..... Alice J. Duck Clerk

241 3-5-68

714

No. 2222 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Eugene Ingram

Plaintiffs

vs.

Wesley D. Adams, a/k/a

Dee Adams a/k/a

W. D. Adams

Defendants

SUMMONS AND COMPLAINT

Filed FILED 19.....

SEP 7 1967

Clerk

ALICE J. DUCK

CLERK
REGISTER

Ret. Not Found

*9-8-67
Jm Eastman, DS.*

WILTERS, BRANTLEY & NESBIT

BY:.....

Plaintiff's Attorney

ADDRESS of Def.....

Defendant's Attorney

Home 1809 GILMER AVE

TALLASSEE, ALA.

Dee's DOLLAR STORE

17 SISTRUNK AVE.

Elmore Co. RECEIVED

JAN 25 1968
Defendant lives at

TAYLOR WILKINS
SHERIFF

RECEIVED

Received In Office

SEP 7 1967

19.....

TAYLOR WILKINS
SHERIFF

Sheriff

I have executed this summons

this 3/15 19 68

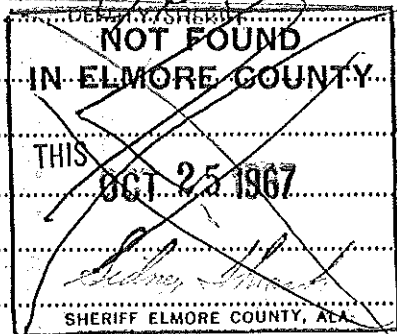
by leaving a copy with

W. D. Adams
Sheriff claims 100 miles at

Ten Cents per mile Total \$ 10.00

TAYLOR WILKINS, Sheriff

BY



Myrtle Wilkins Sheriff
Eastman Deputy Sheriff

Subj News 100 mi.