

MARY ELIZABETH RHODES)
) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
)
) CASE NO. 8120
)
LOUISE C. BROWN)
)
) DEFENDANT)

Comes now the Plaintiff in the above styled cause and shows unto the Court as follows:

1. The Plaintiff obtained a judgment in this court on the 5th day of February, 1969, in the sum of FIVE HUNDRED (\$500.00) DOLLARS against Louise C. Brown; said judgment remains unpaid and unsatisfied. Ten years has elapsed since the issuance of said judgment. Execution was issued in this case on February 28, 1969, and was returned on the 27th day of June, 1969, "no property found".

WHEREFORE, Plaintiff prays that a Writ of Scire Facias issue out of this Court requiring the Defendant to show cause, if any she has, within thirty days after service of such writ, why said judgment should not be in all things revived and execution issued on the same, and upon the hearing of this Petition, if any legal reason be shown why said judgment should not be revived, an order reviving the same entered with provisions for execution.

FILED

FEB 23 1979

EUNICE B. BLACKMON CIRCUIT
 CLERK

T. M. Brantley

T. M. Brantley
P.O. Box 968
Bay Minette, Alabama 36507
Attorney for the Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

Personally appeared before me, the undersigned authority, in and for said county and State, T. M. Brantley, who being by me first duly sworn, doth depose and say that the statements contained in the foregoing Petition are true and correct.

T. M. Brantley
T. M. Brantley

Subscribed and sworn to before me on this the 23rd day of February, 1979.

Chas. Fischer
Notary Public.

ORDER

Upon consideration of the foregoing Petition, it is ORDERED that a Writ of Scire Facias issue by the Clerk of this Court to the said Louise C. Brown in the manner and form as provided by law.

W. A. Day
CIRCUIT JUDGE

FILED

FEB 23 1979

EUNICE B. BLACKMON
CIRCUIT CLERK

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Louise C. Brown, to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the Complaint of Mary Elizabeth Rhodes.

Witness my hand, this the 1st day of May, 1968.

Alice D. Wilk
Clerk

MARY ELIZABETH RHODES,

Plaintiff,

vs.

LOUISE C. BROWN,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO.

8120

1.

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED DOLLARS (\$500.00), due from her by account on the 28th day of February, 1968, which sum of money, with the interest thereon is still unpaid.

2.

The Plaintiff claims of the Defendant the sum of TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500.00), damages for the false representation of the sale of the Defendant's stock in Brown's Building Supply, Inc., a Corporation, wherein the Defendant represented to the Plaintiff that the Corporation had on hand certain stocks and materials and accounts receivable, when in fact the Corporation did not have even approximately the amount represented by the Defendant, all of which

she had knowledge.

WILTERS & BRANTLEY

BY:

Henry J. Wilters Jr.

Foley, Ala.

FILED

MAY 1 1968

ALICE J. DUCK

CLERK
REGISTER

Goley

Received 2 day of May 1968
at on 13 day of May 1968
served a copy of the within S & C
Louise C. Brown
y service on Alton

TAYLOR WILKINS, Sheriff
By Tom Castles D.S.
Goley, Ala
✓

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING 1 PROCESS AND
TRAVEL EXPENSE ON EACH OF 720
PROCESS(ES) OR A TOTAL OF \$ 820

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8120

MARY ELIZABETH RHODES,
Plaintiff,

vs.

LOUISE C. BROWN,

Defendant.

SUMMONS AND COMPLAINT

WILTERS & BRANTLEY
Attorneys at Law
Bay Minette, Alabama

FILED

MAY 1 1968

ALICE J. DUCK CLERK
REGISTER

MARY ELIZABETH RHODES

Plaintiff

vs

LOUISE C. BROWN

Defendant

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

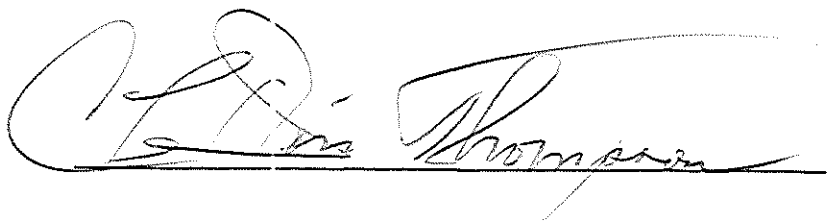
AT LAW

NO. 8120

Comes C. LeNoir Thompson, attorney for the defendant
and withdraws his appearance as attorney of record in the
above matter.



I hereby certify that I have this 11th day of September,
1968, forwarded postage prepaid all papers together with
a copy of this withdrawal to Honorable John Duck, attorney
for Mrs. Louise C. Brown.



FILED

SEP 13 1968

ALICE J. DUCK

CLERK
REGISTER

JOHN V. DUCK
ATTORNEY AT LAW
P. O. BOX Y
FAIRHOPE, ALABAMA 36532

December 10, 1968

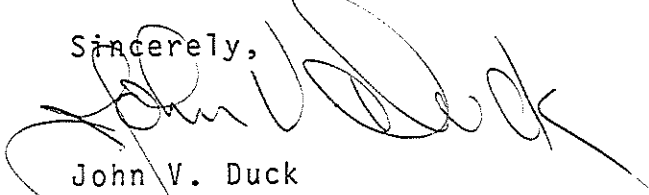
Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

Re: Mary Elizabeth Rhodes
vs. Louise C. Brown
Civil Case No. 8120

Dear Mrs. Duck:

Please withdraw my name as attorney for Defendant
in above captioned case.

Sincerely,



John V. Duck

JVD:lh

cc: Wilters & Brantley
Attorneys at Law
Bay Minette, Ala.

MARY ELIZABETH RHODES

Plaintiff

vs

LOUISE C. BROWN

Defendant

X

X

X

X

X

IN THE CIRCUIT COURT OF

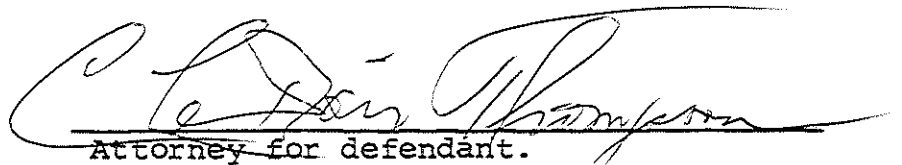
BALDWIN COUNTY, ALABAMA

AT LAW NO. 8120

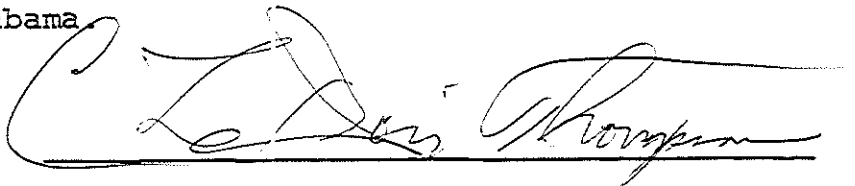
Comes the defendant in the above styled cause and demurs to the complaint filed in said cause and to each count thereof separately and severally as follows:

1. Count one of said complaint fails to state a cause of action.

2. Count two of said complaint fails to state a cause of action.


Attorney for defendant.

I hereby certify that I have this 30 day of May, 1968, served a copy of the foregoing demurrers on Honorable Harry J. Wilters, attorney for the plaintiff by depositing copy of same in the U. S. Mail, postage prepaid, properly addressed to his office in Bay Minette, Alabama.



FILED

MAY 31 1968

ALICE J. BOCK

CLERK
REGISTER

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck
Bay Minette, Ala.

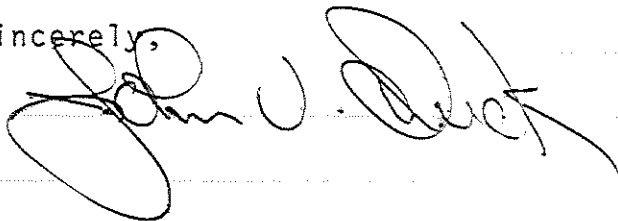
DATE September 12, 1968

Re: Mary Elizabeth Rhodes vs. Louise C.
Brown. Civil Case No. 8120

Dear Mrs. Duck:

Please enter my name as Attorney for
Louise C. Brown, Defendant, in above
captioned case.

Sincerely,



SIGNED

DATE

FILED

SEP 16 1968

ALICE J. DUCK

CLERK
REGISTER

SIGNED

STATE OF ALABAMA) IN THE CIRCUIT COURT OF
BALDWIN COUNTY) BALDWIN COUNTY, ALABAMA
TO THE SHERIFF OF SAID COUNTY - GREETING:

You are hereby commanded to forthwith serve the within writ personally on each of the following named defendants:

Louise C. Brown.

Witness my hand this the 23 day of Feb., 1979.

Eunice B. Blackmon
Clerk of the Circuit Court of Baldwin
County, Alabama.

MARY ELIZABETH RHODES) IN THE CIRCUIT COURT OF
PLAINTIFF) BALDWIN COUNTY, ALABAMA

VS

LOUISE C. BROWN)
Goley, Al. DEFENDANT)

FILED

FEB 23 1979

EUNICE B. BLACKMON CIRCUIT
CLERK

TO: Louise C. Brown:

You will take notice that plaintiff in the above entitled cause has filed a petition in the Circuit Court of Baldwin County, Alabama, to revive a judgment rendered on February 5, 1969, against you in said court in cause No. 8120, for the sum of \$500.00 and costs of suit.

Now, therefore, you are hereby notified to show cause, if any you have, why said judgment should not be revived against you within thirty days after the date of service hereof.

Witness my hand this the 23 day of Feb., 1979.

Eunice B. Blackmon
Clerk of the Circuit Court of Baldwin
County, Alabama

Filed in office 2-23, 1979.

Executed by serving a copy of the within on _____,
1979.

Sheriff of Baldwin County, Alabama

BY: _____
Deputy Sheriff.

FILED

FEB 23 1979

EUNICE B. BLACKMON CIRCUIT
CLERK

RECEIVED

FEB 26 1979

THOMAS H. BENTON,
SHERIFF

8120

Mary Elizabeth Rhodes

VS:

Louise C. Brown

FILED

FEB 23 1979

EUNICE B. BLACKMON CIRCUIT
CLERK

DEEDS BOOK 100 PAGE 100

Received 26 day of Feb 1979

and on 28 day of Feb 1979

I served a copy of the within to & under

on Louise C. Brown

By service on Louise C. Brown

THOMAS H. BENTON, SHERIFF

By L. C. Brown D.S.