

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

30TH FLOOR- FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

June 18, 1969

MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARD HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. McDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT

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

Re: F. V. Zink v. Charles P. Forrest,
Case No. 8168

Dear Judge Mashburn:

Ernest Bailey and I have agreed on a settlement of the above-referenced case. Mr. Bailey informed me of his conversation with you on June 17, pursuant to withdrawing his demand for a jury trial and allowing a judgment to be entered against Mr. Forrest by consent. The amount of the judgment should be \$1,783.43, with waiver of exemptions under the constitution and laws of Alabama, which was arrived at as follows:

Principal due on Note -----	\$1,411.70
Interest from January 18, 1968 ----	\$ 159.98
Attorneys fee (15%) -----	\$ 211.75
 TOTAL.	 <u>\$1,783.43</u>

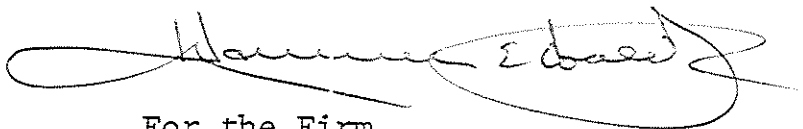
It is my understanding that this judgment will be entered without the necessity of my presence in court, but if I am mistaken, please advise and I will be happy to appear at whatever time is convenient with the court.

Honorable Telfair J. Mashburn
June 18, 1969
Page 2

We would appreciate the court forwarding a copy of the judgment to our offices after it has been entered.

Thank you for your assistance and cooperation in this matter.

Yours very truly,

A handwritten signature in dark ink, appearing to read "Ernest Bailey", is written over a horizontal line. The signature is fluid and cursive, with a large loop at the end.

For the Firm

HEC.sp

cc: Ernest Bailey, Esquire

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

Re: Film Processors v. C. P. Forrest
Case No. 8272

Dear Judge Mashburn:

Ernest Bailey and I have agreed on a settlement of the above-referenced case. Mr. Bailey informed me of his conversation with you on June 17, pursuant to withdrawing his demand for a jury trial and allowing a judgment to be entered against Mr. Forrest by consent. The amount of the judgment should be \$1,835.16, with waiver of exemptions under the constitution and laws of Alabama, which was arrived at as follows:

Principal due on Note -----	\$1,476.00
Interest from March 25, 1968-----	\$ 137.76
Attorney's fee (15%)-----	\$ 221.40
TOTAL. \$1,835.16	

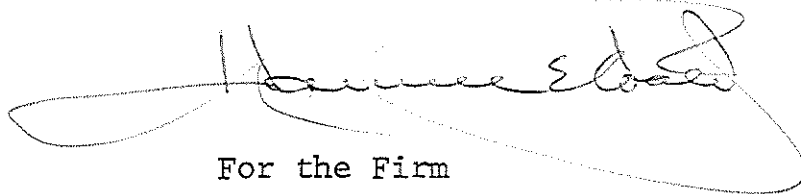
It is my understanding that this judgment will be entered without the necessity of my presence in court, but if I am mistaken, please advise and I will be happy to appear at whatever time is convenient with the court.

Honorable Telfair J. Mashburn
June 18, 1969
Page 2

We would appreciate the court forwarding a copy of the judgment to our offices after it has been entered.

Thank you for your assistance and cooperation in this matter.

Yours very truly,

A handwritten signature in dark ink, appearing to read "Ernest Bailey", is written over a horizontal line. The signature is fluid and cursive, with a large loop at the end.

For the Firm

HEC.sp

cc: Ernest Bailey, Esquire

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LAWYERS

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MOBILE, ALABAMA

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STEPHEN G. CRAWFORD
JERRY A. McDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
C. WAYNE LOUDERMILCH
A. CLAY RANKIN, III

June 7, 1968

Clerk of the Court
Baldwin County
Bay Minette, Alabama 36507

Re: F. V. Zink v. Charles P. Forrest
Our File WBH/CWL 8156

8168

Dear Sir:

Enclosed please find a complaint which we would appreciate your having filed and served on the defendant, Charles P. Forrest.

Thank you for your help and assistance in this matter.

Yours very truly,

Wayne Loudermilk

For the Firm

CWL:ls
Enc.

F. V. ZINK, § IN THE CIRCUIT COURT OF
Plaintiff, § BALDWIN COUNTY, ALABAMA
vs. §
CHARLES P. FORREST, §
Defendant. §

8168

C O M P L A I N T

Plaintiff claims of the defendant the sum of ONE
THOUSAND FOUR HUNDRED ELEVEN AND 70/100 (\$1,411.70)
DOLLARS, due by promisory note made by him on the 18th
day of October, 1967, and payable on January 18, 1968,
with interest thereon and a reasonable attorney's fee.

COUNT TWO

Plaintiff claims of the defendant the sum of ONE
THOUSAND FOUR HUNDRED ELEVEN AND 70/100 (\$1,411.70)
DOLLARS, due by promisory note made by him on the 18th
day of October, 1967, and payable on the 18th day of
January, 1968, with interest thereon.

C. Wayne Loudermilch
C. WAYNE LOUDERMILCH
Attorney for Plaintiff

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

The defendant, Charles P. Forrest,
may be served at his residence on
Ingleside Avenue, or at his place
of business, Forrest Industries,
801 North Section, Fairhope, Alabama.

FILED

JUN 10 1968

ALICE J. BOCK

CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8168

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Charles P. Forrest

.....
.....
.....
.....
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.....

..... Charles P. Forrest Defendant.....

by F. V. Zink

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

Witness my hand this 10th day of June 1968.....

Alice J. Luck, Clerk

No. 8168

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

F. V. ZINK

Plaintiffs

vs.

CHARLES P. FORREST

Defendants

SUMMONS AND COMPLAINT

Filed June 10, 1968

Alice J. Duck Clerk

Hand, Arendall, Bedsole, Greaves & Johnston

C. WAYNE LOUDERMILCH

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

RECEIVED

JUN 10 1968

19.....

Sheriff

TAYLOR WILKINS

I have executed this summons

this 6-18-1968

by leaving a copy with

Charles P. Forrest
& wife

Sheriff claims 70 miles at

Tor Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Gayn Wilkins, Sheriff

Roy Rawls, Deputy Sheriff

ERNEST M. BAILEY
ATTORNEY AT LAW
59 NORTH SECTION
FAIRHOPE, ALABAMA 36532

BOX 361

JULY 16, 68
19

ALICE J. DUCK
CLERK OF CIRCUIT COURT
BAY MINETTE, ALABAMA 36507

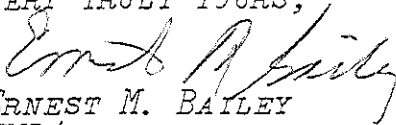
RE: ZINK VS FORREST
CASE # 8168

DEAR MRS. DUCK:

I WILL APPRECIATE YOU FILING THE ATTACHED DEMURRER
IN THE ABOVE CAUSE. MR. C. WAYNE LOUDERMILCH, OF
HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON, IS THE
ATTORNEY FOR THE PLAINTIFF.

THANKING YOU IN ADVANCE, I AM

VERY TRULY YOURS,


ERNEST M. BAILEY
EMB/w

INCL: AS NOTED

F. V. ZINK,)
)
 PLAINTIFF) IN THE CIRCUIT COURT OF
)
 VS) BALDWIN COUNTY, ALABAMA
)
 CHARLES P. FORREST,) CASE NO: 8168
)
 DEFENDANT)

DEMURRER

COMES THE DEFENDANT, CHARLES P. FORREST, IN THE ABOVE
STYLED CAUSE AND DEMURS TO THE PLAINTIFF'S COMPLAINT, AND TO EACH
COUNT THEREOF SEPARATELY AND SEVERALLY, AND ASSIGNS THE FOLLOWING
GROUNDS OF DEMURRER;

1. IT DOES NOT APPEAR THEREFROM THAT THERE WAS ANY CON-
SIDERATION FOR DEFENDANT'S ALLEGED PROMISE.
2. SAID COUNT IS VAGUE AND INDEFINITE.
3. IT DOES NOT APPEAR THEREFROM WHAT THE RATE OF INTEREST
WAS ON THE ALLEGED PROMISSORY NOTE.
4. IT DOES NOT APPEAR THEREFROM WHAT AMOUNT WAS DUE WITH
REGARD TO THE INTEREST ON THE ALLEGED PROMISSORY NOTE.

Ernest M. Bailey
ERNEST M. BAILEY,
ATTORNEY FOR THE DEFENDANT

CERTIFICATE OF SERVICE

I, ERNEST M. BAILEY, DO HEREBY CERTIFY THAT I HAVE THIS 16th
DAY OF JULY, 1968, MAILED COPY OF THE ABOVE AND FOREGOING DEMURRER
TO C. WAYNE LOUDERMILCH, ATTORNEY OF RECORD FOR THE PLAINTIFF,
BY UNITED STATES MAIL, FIRST CLASS POSTAGE PREPAID, AND PROPERLY
ADDRESSED TO HIM IN MOBILE, ALABAMA.

Ernest M. Bailey
ERNEST M. BAILEY
ATTORNEY FOR DEFENDANT

DEFENDANT DEMANDS A TRIAL
BY JURY.

Ernest M. Bailey
ERNEST M. BAILEY
ATTORNEY FOR THE DEFENDANT

JUL 17 1968

ALICE J. DUCK CLERK
REGISTER