

C. LENOIR THOMPSON

Attorney-At-Law

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May 21, 1968

Honorable J. D. Richardson
Clerk of the Court of General Sessions
Mobile County
Mobile, Alabama

Re: Mrs. Percy A. Bryant

vs.

Alfred O. Davis

Case No. 66484

Dear Sir:

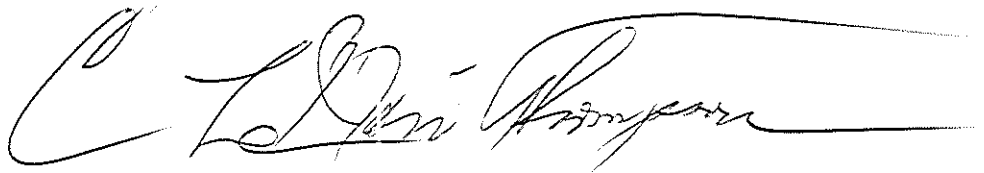
I am attaching a plea to the venue in the above styled cause and have written counsel for the plaintiff.

Since this case was served after your court closed for the day, on May 20, 1968, I feel that it was continued for service as to your records.

In the event counsel for the plaintiff insists on a hearing, your kindness in advising me will be sincerely appreciated.

With personal regards and in appreciation, I am,

Yours very truly,

A handwritten signature in cursive script, reading "C. Lenoir Thompson". The signature is written in dark ink and is positioned below the typed name "C. LENOIR THOMPSON".

CLT/hm

MRS. PERCY A. BRYANT

Plaintiff

vs

ALFRED O. DAVIS

Defendant

X
X
X
X
X

IN THE GENERAL SESSIONS

COURT OF MOBILE COUNTY

ALABAMA AT LAW

CASE NO. 66484

Comes the defendant in the above-entitled cause, appearing specially and only for the purpose of filing this plea and says that the said Mrs. Percy A. Bryant, plaintiff in this cause, ought not to have and maintain her said action for the defendant says separately and severally, as follows, to-wit:

FIRST

That said defendant is a permanent resident of Baldwin County, Alabama, and is not a resident of Mobile County, Alabama.

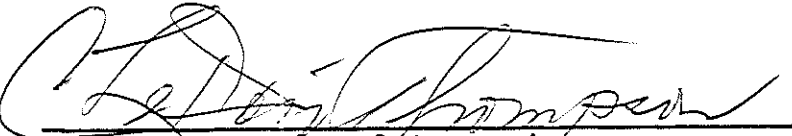
SECOND

That the said defendant resides in Bay Minette, Alabama, and resided at this address when the alleged accident occurred in Bay Minette, Alabama, and said defendant has continued to reside at said address until the present date when the said cause of action arose.

THIRD

That the said defendant has never resided in Mobile County, Alabama.

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


Attorney for Alfred O. Davis

SPC

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Helen McDowell, a Notary Public, in and for said County, in said State, personally appeared C. LeNoir Thompson, as attorney for Alfred O. Davis and who being known to me and by me first duly sworn deposes and says on oath:

That he is attorney for the defendant in the above entitled cause and has personal knowledge of the facts stated in the foregoing pleas and that the said statements of fact therein contained are true.

C. LeNoir Thompson
C. LeNoir Thompson

Sworn to and subscribed before me, this 21 day of May, 1968.

Helen McDowell
Notary Public, Baldwin County, Alabama.

THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

	:	Case No. <u>66484</u>
	:	
<u>Mrs. Percy A. Bryant</u>	:	Filed: April 12, 1968
Plaintiff	:	
	:	Summons Issued: April 16, 1968
VS	:	
	:	Returnable: May 20, 1968
	:	
<u>Alfred O. Davis</u>	:	Service Had: 5-20-68
Defendant	:	
	:	Cause of Action: Accident
	:	
Amount of Claim: <u>\$750.00</u>	:	Attorney for Plaintiff: Wm. H. Card, Jr.
	:	Attorney for Defendant: LeNoir Thompson
	:	

6-17-68


Plea In Abatement filed 5-22-68.

June 17, 1968. Plea in Abatement Confessed. Proceedings transferred to Baldwin County Circuit Court. ELH


Special Judge

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 25th day of June, 1968.


Clerk of The Court of General
Sessions of Mobile County, Alabama

COST BILL

Wm. Card
ATTORNEYS FOR PLTF:—

General Sessions (Civil Div.) Court of Mobile, Mobile County Court House, Mobile, Ala.

Mrs. Percy A. Bryant
Plaintiff
Alfred O. Davis
Defendant

CASE NO. *66484*

Garnishee

COURT FEES

Summons and proceedings thereon to judgment

.....\$1.00.....✓

Docketing each cause10.....✓

Law Library Fee1.00.....✓

Garnishment1.25.....✓

Appeal

TOTAL \$.....

SHERIFF'S FEES

Levying Attachment6.00.....

Entering and returning same25.....

Summoning Garnishee and making return1.50.....

Serving Summons and other mesne process, and returning the same1.50.....✓

Collecting execution for costs only1.50.....

Serving any summons not herein provided for, and making return1.50.....✓

TOTAL \$.....

GRAND TOTAL \$.....*6.35*.....

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.

J. D. Richardson, Clerk

TRANSFER

NOTICE of ~~ARREST~~

STATE OF ALABAMA, }
MOBILE COUNTY }

Mrs. Percy A. Bryant

Plaintiff

VS.

Alfred O. Davis

106 W. 15th St., Bay Minette, Alabama

Defendant

To Alfred O. Davis

in said Cause: Mrs. Percy A. Bryant VS Alfred O. Davis

You are hereby notified that

Mrs. Percy A. Bryant

in the above entitled cause has prayed
the plaintiff ~~and the above entitled cause has prayed and ob-~~
and a transfer to the Circuit Court of Baldwin County, Alabama ~~and ob-~~
tained an appeal from the judgment therein rendered by
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 ~~MOBILE~~ Baldwin County, to be held for
said County, you are hereby notified accordingly.

Given under my hand this the 25 day of June 19 68

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

Case No. 66484

Mrs. Percy A. Bryant

Plaintiff,

VS

Alfred O. Davis
106 W. 15th Street
Bay Minette, Alabama

Defendant.

NOTICE OF ~~ARREST~~ TRANSFER

Returnable To The Circuit Court
OF BALDWIN COUNTY

Issued: June 25, 1968

Serve On:

Alfred O. Davis