

ORIGINAL

MARTHA KNOWLES,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
HILDA A. FREE,)	8464
Defendant.)	

COUNT ONE

Plaintiff claims of the Defendant the sum of ONE HUNDRED FORTY-THREE AND 40/100 (\$143.40) DOLLARS due from her for money loaned by the Plaintiff to the Defendant on the 10th day of September, 1968, which sum of money, with the interest is still unpaid.

COUNT TWO

Plaintiff claims of the Defendant the sum of ONE HUNDRED FORTY-THREE AND 40/100 (\$143.40) DOLLARS due from her for money paid by the Plaintiff for the Defendant on the 10th day of September, 1968 at her request, which sum of money, with the interest thereon, is still unpaid.


ATTORNEY FOR PLAINTIFF

FILED

DEC 11 1968

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8464

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon HILDA A. FREE

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.....

HILDA A. FREE Defendant.....

by MARTHA KNOWLES

Plaintiff.....

Witness my hand this 11 day of Dec - 1968

Alice J. Duck Clerk

Exp/12/11/69

BM-ORIGINAL

Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MARTHA KNOWLES

Plaintiffs

131 vs.
HILDA A. FREE

Defendants

SUMMONS AND COMPLAINT

FILED

Filed DEC 11 1968 19

Clerk

RECEIVED
CLERK'S
REGISTER
COUNTY CLERK
BALDWIN COUNTY, ALA.

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Mel's Photo Shop, Springdale
Plaza, Mobile, Alabama

Received
NOTIFIED

DEC 11 1968 19

WILLIAMS, Sheriff
I have executed this summons

this 13 19 68
by leaving a copy with

Hilda A. Free

Ray N. Brundage, Sheriff

N. Brundage, Deputy Sheriff

MARTHA KNOWLES,	Y	IN THE CIRCUIT COURT OF
Plaintiff,	:	
	Y	
VS:	:	BALDWIN COUNTY, ALABAMA
	Y	
HILDA A. FREE,	:	
	Y	AT LAW
	:	
Defendant.	Y	CASE NO. <u>8460</u>

PLEA IN ABATEMENT

Comes now the Defendant in the above entitled cause, HILDA A. FREE, and appearing specially for the purpose of filing this Plea In Abatement to each and every Count of the Complaint, separately and severally, and for no other or further purpose, and says that at the time the suit was instituted and at the time the cause of action alleged in the Complaint arose, the Defendant was a bona fide resident of the County of Mobile, State of Alabama, and that the Circuit Court of Baldwin County, Alabama, is without jurisdiction to hear this cause.

WHEREFORE, THE PREMISES CONSIDERED, Defendant moves this Honorable Court to abate this cause or, in the alternative, to transfer said cause to the Court of General Sessions of Mobile County, Alabama, which said Court will, upon transfer, have jurisdiction of said cause.

Hilda A. Free
HILDA A. FREE

STATE OF ALABAMA)
:
COUNTY OF MOBILE)

Personally appeared before me, the undersigned authority in and for said County in Said State, HILDA A. FREE, who, being first duly sworn, upon oath, says that the facts set out in the foregoing Plea and Abatement are true and correct as therein stated.

Hilda A. Free
HILDA A. FREE

Subscribed and sworn to before me on this 30th day of December, 1968.

Betty B. Jones
Notary Public

William L. Green
WILLIAM L. GREEN, Attorney for
the Defendant

Specially appearing

FILED
JAN 2 1969
J. L. LEE

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

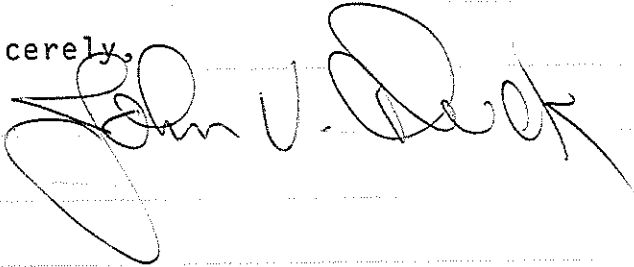
DATE December 9, 1968

Re: Martha Knowles vs. Hilda A. FREE

Dear Mrs. Duck:

Enclosed please find Bill of Complaint
to be filed, together with copy of same
and Summons to be served. Also enclosed
is Plaintiff's check in the amount of
\$25.00 as a cost deposit.

Sincerely,



SIGNED

SIGNED