

BERTIE PHAREZ RECTOR,

IN THE CIRCUIT COURT OF

Plaintiff

vs:

BALDWIN COUNTY, ALABAMA

FRANK L. HAWKINS, SUE HAWKINS and  
SOUTHERN MOTELS, INC., a corp.

AT LAW, CASE NO. 8737

Defendants

*Mobile County Court # 30572*

I, John E. Mandeville, Clerk of the Circuit Court of Mobile County,  
Alabama, do hereby certify that I have this 12th day of January, 1970,  
Received the transcript in the above styled cause, transferred from Baldwin  
County, Alabama Circuit Court to Mobile County, Alabama, Circuit Court.

*John E. Mandeville*  
CIRCUIT CLERK.

STATE OF ALABAMA  
I CERTIFY THIS FILING  
WAS FILED ON

JAN 12 8 12 AM '70

*Robert J. [unclear]*  
Clerk

BERTIE PHAREZ RECTOR,

Plaintiff

IN THE CIRCUIT COURT OF

vs:

BALDWIN COUNTY, ALABAMA

FRANK L. HAWKINS, SUE HAWKINS and  
SOUTHERN MOTELS, INC., a corp.

AT LAW, CASE NO. 87B7

Defendants

I, John E. Mandeville, Clerk of the Circuit Court of Mobile County,  
Alabama, do hereby certify that I have this 24 day of January, 1970,  
Received the transcript in the above styled cause, transferred from Baldwin  
County, Alabama Circuit Court to Mobile County, Alabama, Circuit Court.

  
CIRCUIT CLERK.

BERTIE PHAREZ RECTOR,

Plaintiff,

vs.

FRANK L. HAWKINS, SUE HAWKINS,  
and SOUTHERN MOTELS, INC.,  
A Corporation, jointly and  
severally,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

NO. 8737

ORDER:

This cause coming on to be heard in open Court on the 4th day of November, 1969, and on that day came the parties to be heard on the defendants' plea in abatement filed in this cause and the testimony upon said plea in abatement being heard and being argued by counsel and understood by the Court, it is, therefore,

ORDERED, ADJUDGED AND DECREED by the Court that defendants' said plea in abatement be, and the same is hereby sustained and this cause ordered transferred to the Circuit Court of Mobile County, Alabama, for further proceedings.

DONE this 31<sup>st</sup> day of December, 1969.

J. J. Madeline  
Circuit Judge.

FILED

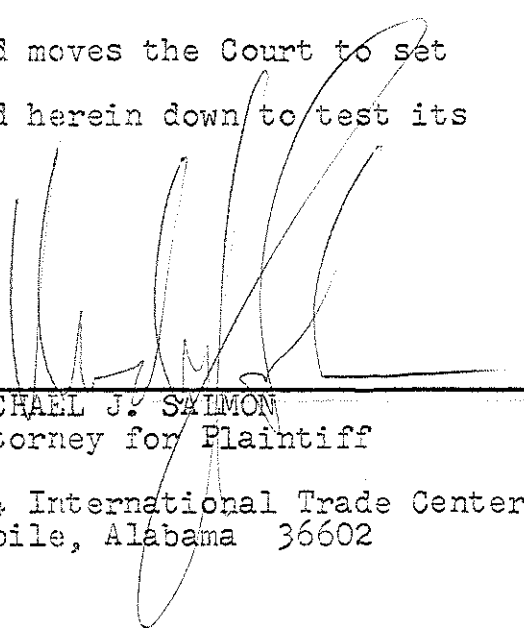
DEC 31 1969

ALICE J. DUCK CLERK  
REGISTER

RECORDED MINUTE BOOK 12, page 281

BERTIE PHAREZ RECTOR,	:	IN THE CIRCUIT COURT OF
Plaintiff,	:	BALDWIN COUNTY, ALABAMA
-vs-	:	
FRANK L. HAWKINS, SUE	:	AT LAW
HAWKINS, and SOUTHERN	:	
MOTELS, INC., a corpora-	:	
tion, jointly and sever-	:	CASE NUMBER 8,737
ally,	:	
Defendants.	:	

Comes now the Plaintiff and moves the Court to set the plea in abatement heretofore filed herein down to test its sufficiency.

  
 MICHAEL J. SALMON  
 Attorney for Plaintiff

324 International Trade Center  
 Mobile, Alabama 36602

CERTIFICATE OF SERVICE

I do hereby certify that I have served a copy of the foregoing pleading upon Jack W. Morgan, Esquire, Attorney for the Defendants in this cause, by depositing the same in the United States mail, properly addressed and first class postage prepaid, this 28th day of August, 1969.

  
 MICHAEL J. SALMON

FILED

AUG 28 1969

ALICE J. ELLIOTT, CLERK

LAW OFFICES  
HOLBERG, TULLY AND HODNETTE

1107 MILNER BUILDING

P. O. BOX 47

MOBILE, ALABAMA

36601

TELEPHONE

432-8863

RALPH G. HOLBERG, JR.  
ALBERT J. TULLY  
ROBERT E. HODNETTE, JR.  
A. NEIL HUGGENS  
RALPH G. HOLBERG, III  
JACK W. MORGAN

July  
19th,  
1969

Mrs. Alice J. Duck, Clerk  
Circuit Court, Baldwin County  
The Court House  
Bay Minette, Alabama

Re: Rector v. Hawkins et al, at law No. 8737

Dear Mrs. Duck:

We represent the defendants in the above cause and I enclose the original and one copy of a Plea in Abatement for filing in the cause. You will note on the original of the plea a certificate that the plaintiff's attorney, Mr. Salmon, has been served by mailing him a copy of the Plea in Abatement. I understand that this service is satisfactory in your Circuit Court, if not, the extra copy is for your use in serving the plaintiff.

I will greatly appreciate your kindness in advising me when this Plea in Abatement will come up for hearing.

Very truly yours,

HOLBERG, TULLY AND HODNETTE

  
Robert E. Hodnette, Jr.

R  
E  
H  
/  
t

MICHAEL J. SALMON  
LAWYER  
SUITE 324  
INTERNATIONAL TRADE CENTER  
250 N. WATER STREET  
MOBILE, ALABAMA 36602  
433-5595

May 30, 1969

8737  
sum

Mrs. Alice Duck  
Register, Circuit Court  
County Courthouse  
Bay Minette, Alabama

Re: Bertie Pharez Rector vs. Frank  
L. Hawkins, Sue Hawkins and  
Southern Motels, Inc.

Dear Mrs. Duck:

Please file the enclosed bill of complaint in the  
above matter.

Very sincerely yours,

*Michael J. Salmon*  
(Geo)

MICHAEL J. SALMON

jes

Enclosures