

STATE OF ALABAMA)
COUNTY OF BALDWIN)
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANED TO SUMMON MARY E. FOREMAN, TO APPEAR
AND ANSWER, PLEAD OR DEMUR, WITHIN THIRTY DAYS FROM THE DATE HERE-
OF OF THIS SERVICE, TO A BILL OF COMPLAINT FILED AGAINST HER IN
THE CIRCUIT COURT, AT LAW, FOR SAID COUNTY AND SAD STATE BY
WILLIAM L. POST.

HEREIN FAIL NOT, DUE RETURN MAKE OF THIS WRIT AS THE LAW DIRECTS
WITNESS MY HAND THIS THE 10 DAY OF JULY, 1969.

Deirdre J. Welch
REGISTER

WILLIAM L. POST,)
PLAINTIFF,)
VS)
MARY E. FOREMAN,)
DEFENDANT)
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO: 8793

COUNT ONE:

PLAINTIFF CLAIMS OF THE DEFENDANT THE SUM OF THREE THOUSAND
THREE HUNDRED FIFTY-SEVEN DOLLARS AND 54/100 (\$3,357.54) DOLLARS,
DUE BY PROMISSORY NOTE MADE BY HER ON, HERETOFORE, TO-WIT, AUGUST
22ND, 1963, WHICH SUM OF MONEY INCLUDING INTEREST, IS DUE AND UN-
PAID; AND PLAINTIFF AVERS THAT IN AND BY THE TERMS OF SAID NOTE,
THE DEFENDANT WAIVED ALL RIGHTS OF EXEMPTION UNDER THE LAWS OF
THE STATE OF ALABAMA AND PLAINTIFF CLAIMS THE BENEFIT OF SAID
WAIVER; PLAINTIFF CLAIMS THE ADDITIONAL SUM OF SIX HUNDRED SEVENTY
(\$670.00) DOLLARS AS A REASONABLE SUM AS ATTORNEY FEES FOR BRING-
ING THIS SUIT FOR THAT THE DEFENDANT IN AND BY THE TERMS OF SAID
NOTE AGREED TO PAY A REASONABLE ATTORNEY FEE, AND PLAINTIFF AVERS

THAT SAID AMOUNT IS A REASONABLE ATTORNEY FEE FOR THE BRINGING AND PROSECUTING OF THIS SUIT.

COUNT TWO:

PLAINTIFF CLAIMS OF THE DEFENDANT THE SUM OF FIFTEEN THOUSAND NINE HUNDRED SEVENTY-NINE AND 15/100 (\$15,979.15) DOLLARS, DUE BY PROMISSORY NOTE MADE BY HER ON, HERETOFORE, TO-WIT, AUGUST 18, 1964, WHICH SUM OF MONEY INCLUDING INTEREST, IS DUE AND UNPAID; AND PLAINTIFF AVERS THAT IN AND BY THE TERMS OF SAID NOTE, THE DEFENDANT WAIVED ALL RIGHTS OR EXEMPTION UNDER THE LAWS OF THE STATE OF ALABAMA AND PLAINTIFF CLAIMS THE BENEFIT OF SAID WAIVER; PLAINTIFF CLAIMS THE ADDITIONAL SUM OF THREE THOUSAND TWO HUNDRED AND NO/100 (\$3,200.00) DOLLARS AS A REASONABLE SUM AS ATTORNEY FEES FOR BRINGING THIS SUIT FOR THAT THE DEFENDANT IN AND BY THE TERMS OF SAID NOTE AGREED TO PAY A REASONABLE ATTORNEY FEE, AND PLAINTIFF AVERS THAT SAID AMOUNT IS A REASONABLE ATTORNEY FEE FOR THE BRINGING AND PROSECUTING OF THIS SUIT.

BAILEY & TAYLOR

By: Clayton E. Taylor
ATTORNEYS FOR THE PLAINTIFF

FILED

JUL 9 1969

ALICE J. DUCK

CLERK
REGISTER

BILL OF COMPLAINT

WILLIAM L. POST,
PLAINTIFF

VS

MARY E. FOREMAN,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW CASE NO: 8723

DEFENDANT MAY BE SERVED AT
559 N. MOBILE AVENUE
FAIRHOPE, ALABAMA

FILED

JUL 9 1969

ALICE J. DUCK CLERK
REG. CLERK

Received 10 day of July 1969
and on 14 day of July 1969
I served a copy of the within bill
on Mary E. Foreman
By service on _____
TAYLOR WILKINS, Sheriff
By R. Randall D. S.
Fioren

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Randall DEPUTY SHERIFF

438-4231

HUBERT P. ROBERTSON
ATTORNEY AT LAW
25TH FLOOR FIRST NATIONAL BANK BLDG.
MOBILE, ALABAMA

P. O. BOX 226

August 11, 1969

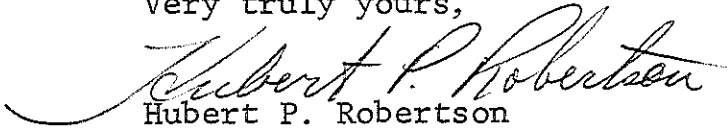
Mrs. Alice J . Duck, Clerk
Circuit Court
Baldwin County Court House
Bay Minette, Alabama

Re: Case No. 8793 - William L. Post vs.
Mary E. Foreman

Dear Mrs. Duck:

Enclosed herewith is Defendant's answer in the above styled cause. Please file it and let me know when a date has been set for trial.

Very truly yours,


Hubert P. Robertson
HPR:ar
encls.

WILLIAM L. POST,
Plaintiff,

VS.

MARY E. FOREMAN
Defendant.

§ IN THE CIRCUIT COURT OF
§ BALDIN COUNTY, ALABAMA
§ AT LAW
§
§ CASE NO. 8793

Comes now MARY E. FOREMAN, Defendant in the above styled cause, and for answer to the Bill of Complaint filed herein and each and every count thereof, files the following separate and several pleas.

PLEA ONE

NOT GUILTY.

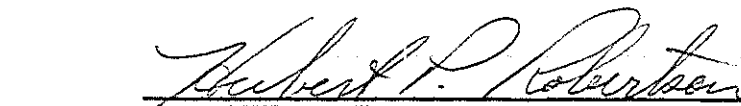
PLEA TWO

The material allegations of the complaint are untrue.



ATTORNEY FOR DEFENDANT

Defendant respectfully demands a trial by jury.



ATTORNEY FOR DEFENDANT

FILED

AUG 12 1969

ALICE J. BUCK CLERK
REGISTER

WILLIAM L. POST
Complainant
VS.
MARY E. FOREMAN
Defendant

* IN THE CIRCUIT COURT OF
* BALDWIN
* OF MOBILE COUNTY
*
* Alabama
* CASE NO. 8793

M O T I O N T O S T A Y

Comes the Defendant in the above styled cause, by and through his Attorney, William M. Clarke, and shows unto this Honorable Court as follows:

That on, to-wit: the 7th day of July, 1970
the said Defendant filed a petition under ~~xxxxxx~~ Straight Bankruptcy
the Bankruptcy Act as amended, Case No. _____ in
the District Court of the United States for the Southern
Division, State of Alabama; ~~that his wages and property~~
~~xxxxxx presently and in the future are under the jurisdiction~~
~~xxxxxx of said District Court~~

WHEREFORE, said Defendant moves this Honorable Court to stay and hold in abeyance all further matters in this proceeding.

WILLIAM M. CLARKE
Attorney for Defendant

BY: Wm M Clarke

cc: Honorable Bailey & Taylor

FILED

JUL 22 1970

ALICE J. DUCK CLERK
REGISTER