

1598

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA;

You are hereby commanded to summon Claude C. Hinote to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of First Finance, Inc., a Corporation.

Witness my hand this 8th day of January, 1951.

Alvin J. Stone
Clerk.

COMPLAINT:

FIRST FINANCE, INC.,
A Corporation,

Plaintiff,

vs.

CLAUDE C. HINOTE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

COUNT ONE:

The Plaintiff claims of the Defendant the following personal property, viz:-

1948 Mercury Club Coupe, Motor #899A-2309670,
1951 License Plate #5D 3988 Alabama,

with the value of the hire or use thereof during the detention, viz: from the 28th day of November, 1950.

COUNT TWO:

The Plaintiff claims of the Defendant One Thousand Dollars (\$1,000.00), damages for the conversion by him, on the 29th day of November, 1950, on the following chattel:

1948 Mercury Club Coupe, Motor #899A-2309670,
1951 License Plate #5D 3988 Alabama,

the property of the Plaintiff.

CHASON & STONE

By: M. J. Stone
Attorneys for Plaintiff

The Defendant resides in
Robertsdale, Alabama.

this day of ~~March~~ 1951
TAYLOR WILKINS, Sheriff

SUMMONS & COMPLAINT

FIRST FINANCE, INC.,
A Corporation,

Plaintiff,

vs.

CLAUDE C. HINOTE,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

RECORDED

FILED

JAN 8 1951

ALICE J. DUCK, Clerk

LAW OFFICES

HYBART, CHASON & STONE

RAY MINETTE, ALABAMA

Executed 11 day Jan 1951

on ~~31st~~ *Claude Hinote*

Karen Winkler
by *Ada Jackson*

FIRST FINANCE, INC.,
A Corporation,

Plaintiff,

VS.

CLAUDE C. HINOTE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

INTERROGATORIES PROPOUNDED BY THE DEFENDANT
TO THE PLAINTIFF:

1. Where was the Plaintiff incorporated?
2. Who were the directors of the Plaintiff corporation on May 13, 1950?
3. What officers did the Plaintiff corporation have on May 13, 1950?
4. Who were the officers of the Plaintiff corporation on May 13, 1950?
5. Who were the directors of the Plaintiff corporation at the time this suit was filed?
6. Who were the officers of the Plaintiff corporation at the time this suit was filed?
7. Where was Standard Motors, Inc., incorporated?
8. Who were the directors of Standard Motors, Inc., on May 13, 1950?
9. What officers did Standard Motors, Inc., have on May 13, 1950?
10. Who were the officers of Standard Motors, Inc., on May 13, 1950?


Attorney for Defendant.

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, within and for said County in said State, personally appeared J. B. BLACKBURN, who, after being by me first duly and legally sworn, deposes and says:

That he is attorney for the Defendant in this cause;
that the above and foregoing interrogatories, if well and truly answered, will be material evidence for the Defendant in this cause.

J. B. Blackburn

Sworn to and subscribed before me on
this the 12th day of February, 1951.

Mary Lou Blackburn

Notary Public, Baldwin County, Alabama.

FIRST FINANCE, INC., a
Corporation,
Plaintiff,
VS.
CLAUDE C. HINOTE,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

DEMURRER.

Now comes the Defendant and for demurrer to the Com-
plainant each and every count thereof, separately and severally,
says:

1. It does not state a cause of action.

J. B. Blackburn
Attorney for Defendant.

DEMURRER

FIRST FINANCE, INC., a Corpora-
tion,
Plaintiff,
VS.

CLAUDE C. HINOTE,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

RECORDED

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FIRST FINANCE, INC.,
A Corporation,

Plaintiff,

vs.

CLAUDE C. HINOTE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

Comes now A. L. Jordan as President of First Finance, Inc., a Corporation, the Plaintiff in this cause and objects to the Interrogatories heretofore propounded by the Defendant to the Plaintiff and assigns the following separate and several grounds viz:

(a) The evidence sought by said Interrogatories is illegal, incompetent, irrelevant and immaterial.

(b) Interrogatory No. 1 seeks evidence which is a matter of public record.

(c) The evidence sought by said Interrogatories can be of no probative value in this cause.

(d) That said Interrogatories are a mere fishing expedition.

Without waiving the foregoing objections to the said Interrogatories, the Plaintiff for answer to the Interrogatories heretofore propounded to it by the Defendant says as follows:

1. Mobile Alabama
2. Harris Masterson
A. L. Jordan
L. C. Vittingl
Clarise Jones
George C. Wilkinson
Joseph Byrnes
3. President - A. L. Jordan
Vice President - Joseph Byrnes
Secretary Treasurer - L. C. Vittingl.
4. See Answer No. 3.
5. A. L. Jordan
George C. Wilkinson
Clarise Jones
Joseph Byrnes
6. President - A. L. Jordan
Vice President - Joesph Byrnes
Secretary - Mrs. Clarise Jones
Treasurer - George C. Wilkinson.

The Plaintiff on advice of Counsel refuses to answer Interrogatories numbered "7" through "10" and assigns the following separate and several grounds for his refusal:

(a) Said Interrogatories are not pertinent to the issue or matter in dispute between the parties.

(b) Said Interrogatories seek to elicit facts which are not pertinent to the issue or matter in dispute.

(c) The facts which the said Interrogatories seek to elicit would be of no probative value in the trial of this cause.

(d) The evidence sought by said Interrogatories is patently objectionable and inadmissible.

(e) The evidence sought by said Interrogatories is prima facie inadmissible.

(f) The said Interrogatories seek evidence which is not known to the Plaintiff, or which should be within its knowledge.

(g) Said Interrogatories are a mere fishing expedition.

(h) Said Interrogatories are patently objectionable and inadmissible in that they require evidence of the Plaintiff which is not, of necessity, within the knowledge of the Plaintiff or any of its officers acting in their capacity as such officers.

(i) Said Interrogatories seek evidence based upon hearsay.

(j) Said Interrogatories call for hearsay evidence.

and the Plaintiff will refuse to answer these Interrogatories unless required to do so by this Honorable Court.

FIRST FINANCE, INC.,
A Corporation,

By: A. L. Jordan
As President.

STATE OF ALABAMA

COUNTY OF MOBILE

Before me the undersigned Notary Public in and for said State and County, personally appeared A. L. Jordan, President of First Finance, Inc., a Corporation, known to me, and who being by me first duly sworn deposes and says that he is President of First

Finance, Inc., a Corporation, the Plaintiff in the above cause
and that the answers to Interrogatories are true and correct.

A. L. Jordan

Subscribed and sworn to
before me this 12th day
of March, 1951.

Fred H. Ballins

Notary Public, Mobile County,
Alabama.

1598

RECORDED

FILED

MAR 21 1951

ALICE J. DUCK, Clerk

86-51

INTERROGATORIES PROPOUNDED BY THE
DEFENDANT TO THE PLAINTIFF.

FIRST FINANCE, INC., a Corpora-
tion,

Plaintiff,

VS.

CLAUDE C. HINOTE,

Defendant.

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

FEB 12 1951

Alice I. Duck, Clerk

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

Executed Feb 12 1951
by serving copy of within Sixty days
Complaint on

Warren Stone Attorney
for Plaintiff

Taylor H. Perkins Sheriff
By St 7/10/51 Deputy Sheriff