

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON  
LAWYERS

30TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:  
P. O. DRAWER C  
OR P. O. BOX 123

CABLE ADDRESS:  
HAS  
TELEPHONE  
432-5511  
AREA CODE 205

CHAS. C. HAND  
C. B. ARENDALL, JR.  
T. MASSEY BEDSOLE  
THOMAS G. GREAVES, JR.  
WM. BREVARD HAND  
VIVIAN G. JOHNSTON, JR.  
PAUL W. BROCK  
ALEX F. LANKFORD, III  
EDMUND R. CANNON  
LYMAN F. HOLLAND, JR.  
J. THOMAS HINES, JR.  
DONALD F. PIERCE  
LOUIS E. BRASWELL  
HAROLD D. PARKMAN  
G. PORTER BROCK, JR.  
HARWELL E. COALE, JR.  
STEPHEN G. CRAWFORD  
JERRY A. MCDOWELL  
W. RAMSEY MCKINNEY, JR.  
LARRY U. SIMS  
A. CLAY RANKIN, III  
EDWARD A. HYNDMAN, JR.  
MICHAEL D. KNIGHT

November 4, 1969

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

Re: Hartford Accident & Indemnity Company  
v. Leslie Wise and Leslie Wise d/b/a  
Wise Auto and Truck Salvage  
Case No. 8870

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Dear Mrs. Duck:

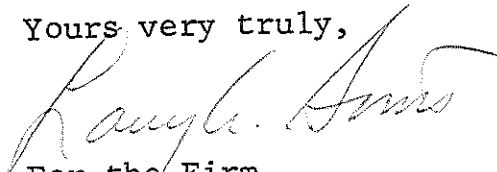
Pursuant to our telephone conversation today, November 4, 1969, I am writing this letter regarding the above referenced case which is ready for a judgment by default.

Your records show that service was had on Leslie Wise and Leslie Wise d/b/a Wise Auto and Truck Salvage on September 9, 1969 by the Deputy Sheriff. Count Two of the Complaint is based on an itemized verified account with the affidavit attached to the Complaint as Exhibit "A". The total amount of the default judgment should be \$926.50. This figure consists of the original indebtedness of \$850.00 with an additional \$76.50 for interest at the rate of 6% per annum since April 30, 1968. I would very much appreciate your taking this letter and the file to Judge Mashburn for the judgment entry. I will await further notice from you as to the final judgment.

Mrs. Alice J. Duck  
November 4, 1969  
Page Two

Let me thank you for this service on my behalf.

Yours very truly,

  
For the Firm

LUS:jl

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MICHAEL D. KNIGHT

September 4, 1969

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

8870

Re: Hartford Accident and Indemnity Company  
v. Leslie Wise, et al

Dear Miss Duck:

I am enclosing herewith the original and two  
copies of a complaint to be filed in your Court.  
Please file same on my behalf.

Thank you for your services in this matter.

Yours very truly,

*Ray G. Smith*  
For the firm

LUS:j1

Enclosure

HARTFORD ACCIDENT AND	:	IN THE CIRCUIT COURT OF
INDEMNITY COMPANY, a	:	
corporation,	:	BALDWIN COUNTY, ALABAMA
Plaintiff,	:	
	:	AT LAW
Vs.	:	
LESLIE WISE and LESLIE	:	
WISE d/b/a WISE AUTO	:	
AND TRUCK SALVAGE,	:	
Defendants.	:	CASE NO. <u>8820</u>

COUNT I

The plaintiff claims of the defendants the sum of Eight Hundred Fifty and No/100 (\$850.00) Dollars due from defendants on account between plaintiff and defendants on, to-wit, the 30th day of April, 1968, which sum of money, with interest thereon, is due and unpaid.

COUNT II

The plaintiff claims of the defendants the sum of Eight Hundred Fifty and No/100 (\$850.00) Dollars due from defendants by account on, to-wit, the 30th day of April, 1968, which sum of money, with interest thereon, is still unpaid.

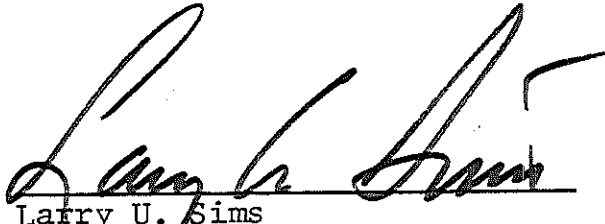
An itemized statement of the account sued on, verified by affidavit of a competent witness, is attached hereto as Exhibit "A" and made a part hereof by reference thereto.

COUNT III

The plaintiff claims of the defendants the sum of Eight Hundred Fifty and No/100 (\$850.00) Dollars due from defendants for the sale of a chattel, to-wit:

One 1968 Cadillac, Sedan DeVille, Serial  
Number B 8205061

sold by plaintiff to the defendants on the 30th day of April, 1968, which sum of money, with interest thereon, is still unpaid.

  
Larry U. Sims  
Attorney for Plaintiff  
First National Bank Building  
Mobile, Alabama

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendants may be served at:

Wise Auto & Truck Salvage  
359 Gaston Avenue  
Fairhope, Alabama

EXHIBIT "A"

<u>Date</u>	<u>Charge</u>	<u>Chattel</u>	<u>Credits</u>	<u>Balance</u>
April 30, 1968	\$850.00	1968 Cadillac Sedan DeVille Serial Number B 8205061		\$850.00

STATE OF LOUISIANA :

PARISH OF ORLEANS :

Personally appeared before me the undersigned Notary Public in and for said parish in said state, Richard S. Davis, who by me being first duly sworn, on oath, did depose and say that he is the salvage and subrogation supervisor of The Hartford Accident and Indemnity Company, a corporation, and as such officer, has authority to make this affidavit; that he has personal knowledge of the matters hereinabove set forth and that the itemized statement hereinabove set forth against Leslie Wise and Leslie Wise d/b/a Wise Auto & Salvage and showing a sum owing thereon in the amount of \$850.00 is true and correct as stated, the said sum is justly due and owing.

Richard S. Davis  
Richard S. Davis

Subscribed and sworn to

before me this 26<sup>th</sup> day

of August, 1969.

Paul Rutledge  
Notary Public, ORLEANS Parish, Louisiana

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 8870

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Leslie Wise & Leslie Wise, d/b/a Wise Auto  
and Truck Salvage

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 Leslie Wise and  
Leslie Wise, d/b/a Wise Auto & Truck Salvage Defendant  
by Hartford Accident and Indemnity Company, a corporation,

Plaintiff  
Witness my hand this 5th day of September 19 69

*Alvin J. Luck* Clerk

24/  
9-9-69

No. 8870.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

HARTFORD ACCIDENT AND INDEMNITY

COMPANY, A Corporation

Plaintiffs

vs.

LESLIE WISE and LESLIE WISE, d/b/a  
WISE AUTO & TRUCK SALVAGE Defendants

SUMMONS AND COMPLAINT

Filed September 5, 1969

Alice J. Duck Clerk

Hand, Arandall, Bedsole, Greaves &  
Johnston Plaintiff's Attorney

Defendant's Attorney

359 Gaston

Defendant lives at

RECEIVED

Received In Office

SEP 5 1969

~~TAYLOR WILKINS~~

19.....

Sheriff

I have executed this summons

this 9-9-1969

by leaving a copy with

Leslie Wise d/b/a  
Wise Auto & Truck Salvage

Sheriff claims 70 miles at 7.00

Ten Cents per mile at \$ 7.00

TAYLOR WILKINS, Sheriff

BY Randall  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Randall Deputy Sheriff

I hope

359 Gaston