

Law Offices of
PERLOFF & REID
SUITE 203 - VAN ANTWERP BLDG.
MOBILE, ALABAMA 36602

December 18, 1969

MAYER W. PERLOFF
T. DWIGHT REID
DONALD M. BRISKMAN

AREA CODE 205
TELEPHONE 433-5412

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

no. 9042

Re: Chrysler Credit Corporation vs. John T. Salter

Dear Mrs. Duck:

Please file the enclosed complaint in your court and advise
when service is obtained.

Very truly yours,


Donald M. Briskman

/mm

CHRYSLER CREDIT CORPORATION,
a corporation,

Plaintiff,

VS.

JOHN T. SALTER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 9046

AMENDED PLEA

Now comes the defendant in the above styled cause and amends the amended plea heretofore filed in the said cause, so that, as amended, the said plea will read as follows:

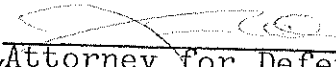
Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause says:

1. The allegations of the complaint are untrue.
2. The defendant for answer to the said complaint says that he has paid the debt for the recovery of which this suit was brought, before the action was commenced.


3. The defendant, as a defense to the action of the plaintiff, says that, at the time said action was commenced, the plaintiff was indebted to him in the sum of \$5,000.00, which the plaintiff claims of the defendant damages for wrongfully taking the following goods and chattels, the property of the plaintiff, viz.:

One 1968 Plymouth automobile, Vehicle No.
RS23L8G268753,

which he hereby offers to set off against the demand of the plaintiff, and he claims judgment for the excess.


Attorney for Defendant

Defendant demands a trial by jury
of said cause.


Attorney for Defendant

FILED

JAN 13 1971

ALICE J. DUCK CLERK
REGISTER

VOL

66 709

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9046

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Chrysler Credit Corporation, a corp.,

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint

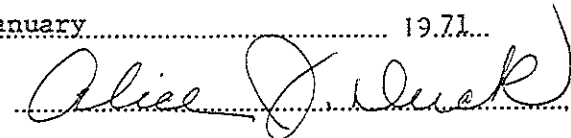
filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette against.....

Chrysler Credit Corporation, a corp. Defendant.....

by John T. Salter.....

....., Plaintiff.....

Witness my hand this 13th day of January 1971..

 Clerk

1-22-71

No. 9046

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THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

CHRYSLER CREDIT CORPORATION, A

Perloff & Reid 22

Corp.

Miss Nelson Leary

Plaintiffs

vs.

JOHN T. SALTER

Defendants

SUMMONS AND COMPLAINT

Filed January 13, 1971

Alice J. Duck

Clerk

Perloff & Reid

12.14.71

Plaintiff's Attorney

James R. Owen

Defendant's Attorney

Defendant lives at

serve: Perloff & Reid as
Attorneys for Chrysler Credit Corp.

Received In Office

RECEIVED

19

JAN 15 1971

Sheriff

I have executed this summons

WILKINS
SHERIFF

this Jan 22 1971

by leaving a copy with

Mrs. Nelson, Secretary for
Perloff & Reid Attorneys

Ray B. Bridges Sheriff

Pat Yanna Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

CHRYSLER CREDIT CORPORATION, *	IN THE CIRCUIT COURT OF
a corporation,	
Plaintiff *	BALDWIN COUNTY, ALABAMA
vs *	AT LAW
JOHN T. SALTER, *	
Defendant *	CASE NO. 9046

Comes now the Plaintiff in the above captioned law suit and for answer to the Defendant's Plea Three saith the following:

1. Not guilty.
2. The allegations are wholly untrue.
3. Not indebted.

PERLOFF, REID & BRISKMAN

BY: 
Attorney for Plaintiff

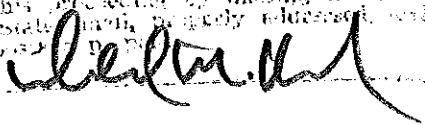
FILED

FEB 19 1971

EUNICE B. BLACKMON CIRCUIT CLERK

CERTIFICATE OF SERVICE

I do hereby certify that I have on Jan 16 day of Feb, 1971, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and that this is a true and correct copy of the original.



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CHRYSLER CREDIT CORPORATION
a corporation
Plaintiff,

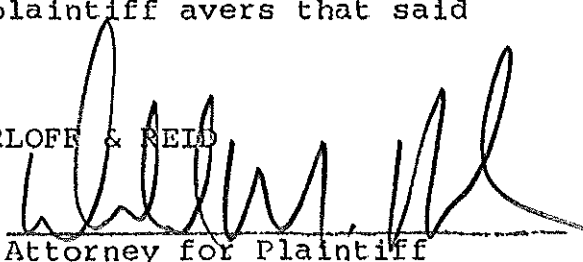
vs.
JOHN T. SALTER

Defendant

(IN THE COURT OF GENERAL SESSIONS
(BALDWIN COUNTY, ALABAMA
(
(AT LAW
(CASE NO. 9046

Plaintiff claims of the defendant \$ 563.04 due from him by written contract heretofore executed by the defendant. Plaintiff avers that the defendant breached said contract in that he failed and refused to pay the installments due thereunder and as a result of said default, the plaintiff did, in accordance with the terms of said contract, repossess the vehicle described in said contract. Plaintiff further avers that said vehicle was duly sold and that the price received therefor constituted the fair and reasonable market value of said vehicle at the time of said sale by plaintiff and that said sale price has been duly credited to the defendant's account and further, plaintiff avers that all just and proper credits have been allowed the defendant, but that the above sum remains due and unpaid. Plaintiff avers that in said contract the defendant waived as to this debt all rights of exemption under the Constitution and Laws of the State of Alabama and further, plaintiff claims the sum of \$ 186.96 as a reasonable attorney's fee, as provided under the terms of said contract, and plaintiff avers that said fee is reasonable.

PERLOFF & REID

BY: 
Attorney for Plaintiff

Serve the defendant at:

308 Hickory Street
Bay Minette, Alabama

FILED

DEC 19 1969

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 9046

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon John T. Salter

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

John T. Salter, Defendant

by Chrysler Credit Corporation, a corp.

Plaintiff

Witness my hand this 19th day of Dec. 1969

Alice J. Duck, Clerk

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1-7-70

No. 9046

Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

CHRYSLER CREDIT CORPORATION,
a corp.

Plaintiffs

vs.

JOHN T. SALTER

Defendants

SUMMONS AND COMPLAINT

Filed 12-19 1969

Alice J. Duck

Clerk

Sheriff claims

miles at

Ten Cents per mile Total \$

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Perloff & Reid

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Dec 19 1969

Taylor Wilkins Sheriff

I have executed this summons

this Jan 7 1970

by leaving a copy with

John T. Salter

Taylor Wilkins Sheriff

W. A. Salter Deputy Sheriff