MERIT CREDIT CORPORATION of Mobile, Inc., d/b/a MERIT CREDIT CORPORATION #4,

Plaintiff

٧s

BOBBY LEE REVELLS and JOAN ANN REVELLS, jointly and individually,

Defendants

IN THE CIRCUIT COURT OF

* BALDWIN COUNTY, ALABAMA

* AT LAW

CASE NO.

9156

MOTION FOR JUDGMENT NIL DICIT

Comes now the Plaintiff in the above captioned cause and moves this Honorable Court to render a Judgment Nil Dicit in favor of the Plaintiff and against the Defendants for that heretofore and on, to-wit: the 2nd day of March, 1970, this cause was transferred from the Court of General Sessions, Mobile County, Alabama to the Circuit Court of Baldwin County, Alabama. Subsequent to that time, the Defendants have failed and refused to file their answer and more than thirty (30) days have elapsed.

WHEREFORE, the premises considered, the plaintiff prays that this Honorable Court will enter a judgment Nil Dicit in favor of the Plaintiff and against the Defendant for \$590.20 and a reasonable attorneys fee.

DONALD M. BRISKMAN, Attorney for

Plaintiff

APR 2 0 1970

ALICE J. DUCK CLERK REGISTER

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NOTICE of APPEAL 9156

STATE OF ALABAMA, \ MOBILE COUNTY	
Merit Credit Corp. of Mobile, Inc.,	e de la companya de La companya de la co
dba Morit Credit Co. #4	. • • • • • • • • • • • • • • • • • • •
Plaintiff VS.	
Bobby Lee Revells & Joan Revells, j Box 326, Stapleton, Alabama Emp: Standard Furniture, Stapleton,	
Defendant	
To Bobb y Le	e Revells & Joan Revells
in said Cause: Merit Credit Corp et al You are hereby notified that	VS Bobby Lee Revells & Joan Revells t Corp. of Mobile, Inc., dba
Merit Credit Co. #	
the Plaintiff a transfer to the Circuit Coutained arranges to the Circuit Coutained	in the above entitled cause has prayed and ob- rt of Baldwin County, Alabama
from	ONS OF MOBILE COUNTY, and having
	in such cases made and provided, the same has
been granted to the next term of the CIRCU	IIT COURT of Months County, to be held for
said County, you are hereby notified accord	
Given under my hand this the 2da	y of March 19.70

Clerk, Court of General Sessions of Mobile County, Civil Division

Merit Credit Corp. of Mobile, Inc., dba Merit Credit Co. #4

VS

Plaintiff,

Bobby Lee Revells & Joan Revells,
Box 326, Stapleton, Alabama
EMP: Standard Furniture, Stapleton, Ala.

Defendant.

TRANSFER NOTICE OF ANXWAXX

Returnable To The Circuit Court
OF BALDWIN COUNTY, ALABAMA

Issued: March 2, 1970

Serve On: Bobby Lee Revells & Joan Revells

COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS COURTROOM "B" FIRST FLOOR

The State of Alabama, The State of Alabama,	AFORTE COLDINAL OPERATION
MOBILE COUNTY	MOBILE COUNTY—GREETINGS:
	\checkmark
You are hereby commanded to summon BOBBY LEE RE	EVELLS, & JOAN REVELLS
jointly and	separately
to I are a local to Contact Contact Contact at Malan	Country at the Country of Mahila
to be and appear before the Court of General Sessions of Mobile	
County, on the Laday of Del	., 19 at the hour of 9:00 A.M.,
	·
then and there to answer a complaint of MERIT CREDIT CO	ORPORATION OF MOBILE, INC.
d/b/a MERIT CREI	DIT COMPANY #4
a corporation	
of a debt or other demand not exceeding Seven Hundred Fifty Do	llars.
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Herein lan not and have you men and mere and precept with	20N 15 1970
Witness my hand, this day of	, 19
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Clerk of the Cou	urt of General Sessions of Mobile County.
Grand A Atting District claims of Defendant \$ 970	*Dlaintiff is licenses under
due by promissory note-contract made by	laws of Georgia"
due by promissory note-contract made by	· man or ocor 2 mm
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And defendant waived all plabs of exact-	
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ney's fee, which is claimed in the amount	
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-JURELL	
Attorneys for Plaintiff	A YOL OU TASE 1 CO

COMPLAINT AND SUMMONS

Atty. for Plaintiff: PERLOFF & REID Atty. for Defendant:	
THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY	
No. 82820	
Ret. MERIT CREDIT CORPORATION OF d/b/a MERIT CREDIT COMPANY	MOBILE, INC. #2
VS.	
BOBBY LEE REVELLS & JOAN REVE	:LLS
Continued To Box 326 Stapleton, Alabama	oloton No
emp: Standard Furniture, Star	offerout, wra.
	14.00 CD
Executed by Service on	
Defendant	
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Sheriff of Mobile County	and the state of t

Deputy Sheriff

COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS COURTROOM "B" FIRST FLOOR

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County, on the	day of	eb-	, 19// at	the hour of 9:00	A.M.,
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of a debt or other Herein fail not	demand not exceed and have you the and, this day	eding Seven Hundred Fifty en and there this precept y of	Court of General	Sessions of Mobile	
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Attorneys for Plaintiff

· 2)		
COMPLAINT AND SUMMONS		
Atty. for Plaintiff: PERLOPP & REED		
Atty. for Defendant:		
THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY	2	
No. 82820		
Ret. Jeh26,/972 MERIT CREDIT CORPORATION OF HOL 8/6/6 MERIT CREDIT COMPANY (4	113, 120, 42 E	
vs. Ho Bodey lee revells a Joan Revells		
Continued To Box 326 Stapleton, Alabama	27 画 %	
/ emp: Standard Furniture, Stapleto	m, Ala	
	1920 1920	neritt La. D.
Sherffs Return	Jec Jec	XINS SX
Executed by Service on Bothy Lee Jan Cenell Defendant	Within Sold Sold Sold Sold Sold Sold Sold Sold	So William
This 20 day	day of the will the w	YAT Ay6
Sheriff of Mebile County	A CODY	
By Leylor Welding		
Deputy Sheriff	Received and on I served on B	<u>}</u>
		

KENNETH COOPER

ATTORNEY AT LAW 109 EAST IN STREET

BAY MINETTE, ALABAMA 36507 TELEPHONE 937-7412 17 February, 1970

Clerk, Court of General Sessions of Mobile County Mobile County Courthouse Mobile, Alabama 36606

> Merit Credit Corp., vs. Bobby Lee Revells, et al. Case No. 82820 Re:

Dear Sir:

Please file attached Plea in Abatement in above-styled cause.

Very truly yours,

KC/ap l incl.

MERIT CREDIT CORPORATION	X	IN THE COURT OF GENERAL
Of Mobile, Inc. d/b/a Merit Credit Company #4,	Ĭ	SESSIONS OF MOBILE COUNTY,
Plaintiff,	Ĭ	ALABAMA
VS	Ĭ	CASE NO.
BOBBY LEE REVELLS and JOAN ANN REVELLS,	Ĭ	
Jointly and Individually,	Ĭ	
Defendants.	δ	

PLEA IN ABATEMENT

Comes now Bobby Lee Revells, individually, and as one of the joint defendants in the above-styled cause, for the special purpose of filing the following plea separately to each count of the complaint in said cause, and for no other purpose, and says that Plaintiff cannot maintain said cause in this Court because:

1. The defendant Bobby Lee Revells is a resident citizen of Stapleton, Baldwin County, Alabama; that he was a resident citizen of said town and county at the time the alleged cause of action arose; that he was a resident citizen of said town and county when this proceeding was filed, and he is still a resident citizen of said town and county; and that the General Sessions Court of Mobile County, Alabama is without jurisdiction to try this suit.

V Bobby LEE R revelle DEFENDANT

STATE OF ALABAMA BALDWIN COUNTY

I, Kenneth Cooper, Notary Public, State At Large, State of Alabama, hereby certify that Bobby Lee Revells, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day, that, being informed of the contents of the conveyance he executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this ____ day of February, 1970.

CERTIFICATE OF SERVICE

depositing same in United State mail postage prepaid, properly addressed to said

Atterney fer:

NOTARY PUBLIC STATE AT LARGE, STATE OF ALABAMA

VOL 66 PAGE 759

MERIT CREDIT CORPORATION	X	IN THE COURT OF GENERAL
Of Mobile, Inc. d/b/a Merit Credit Company #4,	Y	SESSIONS OF MOBILE COUNTY,
Plaintiff,	Ž	ALABAMA
VS	> comp	CASE NO.
BOBBY LEE REVELLS and JOAN ANN REVELLS,	X	
Jointly and Individually,	X	
Defendants.	Ŏ	

PLEA IN ABATEMENT

Comes now Bobby Lee Revells, individually, and as one of the Joint defendants in the above-styled cause, for the special purpose of filing the following plea separately to each count of the complaint in said cause, and for no other purpose, and says the Plaintiff cannot maintain said cause in this Court because: plaint in said cause, and for no other purpose, and says that

1. The defendant Bobby Lee Revells is a resident citizen of Stapleton, Baldwin County, Alabama; that he was a resident citizen of said town and county at the time the alleged cause of action arose; that he was a resident citizen of said town and county when this proceeding was filed, and he is still a resident citizen of said town and county; and that the General Sessions Court of Mobile County, Alabama is without jurisdiction to try this suit.

Bobby Lee Revell

STATE OF ALABAMA

I, Kenneth Cooper, Notary Public, State At Large, State of Alabama, hereby certify that Bobby Lee Revells, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day, that, being informed of the contents of the conveyance he executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this ____ day of February, 1970.

CERTIFICATE OF SERVICE

I hereby certify that I have on this day of Lib., 1970, served a My Commission expire on record 4 February sums in United State mail

postage prepaid, properly addressed to said

STATE AT LARGE, STATE OF ALABAMA

MARIT CREDIT CORPORATION Of Nobile, Inc. 6/5/2 Of Nobile, Inc. d/b/eMerit Czedit Company %k,

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SESSIOMS OF MOBILE COUNTY,

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BOBN ING REVILLS and John Lew Reverla, Johntly and Individually,

__esimebralaC

Comes now Bobby Lee Revells, individually, and as one of the joint defendants in the above-styled cause, for the special purpose filing the following plea separately to each count of the complaint in said cause, and for no other purpose, and says that caused saintain said cause in this Court because: The defeadant Bobby Lee Revells is a resident citizen of

Stapleton, Baldwin County, Alabama; that he was a resident citizen of said town and county at the time the alleged cause of action arose; that he was a resident citizen of said town and county when this proceeding was filed, and he is still a resident citizen of said town and county; and that the General Sessions Court of Mobile County, Alabems is without jurisdiction to try this suit.

MARAIN TO MEANA

I, Kanneth Cooper, Notery Public, State At Large, State of Alabama, hereby certify that Robby Lee Revells, whose name is signed to the foregoing coursyshoe, and an its how-leaged before me on this day, that, being informed of the contents of the converge to executed the same voluntarily on the day the same lears date.

Given under my hand and official seal this ____ day of February, 1970,

CERTIFICATE OF SERVICE

portoge prepaid, properly addressed to said leanua)

Afformay for

TA FIBTE

THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY, ALABAMA

Merit Credit Corp. of Mobile, Inc.,

Filed:

Case No. 82820

dba Merit Credit Co. #4

VS

January 14, 1970

Plaintiff

Issued:

January 15, 1970

Returnable:

February 26, 1970

Service Had:

1-20-70

Bobby Lee Revells & John Revells, jointly)

& separately

Defendant

Cause of Action: P. N.

Attorney for Plaintiff: Perloff & Reid

Attorney for Defendant: Kenneth Cooper

Amount of Claim: \$750.00

2-18-70 Plea in Abatement filed.

2-2-6-70 Cause Transferred to Baldwin County Circuit Court.

I HEREBY CERTIFY THAT THE FOREGOING IS A TRUE AND CORRECT COPY OF THE ABOVE STYLED CAUSE AS IT APPEARS ON RECORD AND IN THE FILES OF THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY, ALABAMA.

WITNESS MY HAND THIS THE 2ND DAY OF MARCH, 1970

CLERK OF THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY, ALABAMA

COST BILL

TTORNEYS FOR PLTF:-

General Sessions (Civil Div.) Court of Mobile, Mobile Count	ty Court House, Mobile, Ala.
ment Credit Cois of Makilo et a	-Q_
Bolding Lee Revelle & Joan Revelle	(1000)
Doling the Chille of gran Revelles	CASE NO. $8 < 8 < 0$
Defendant	
Garnishee	
COURT FEES	
Summons and proceedings thereon to judgment	101
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Docketing each cause	,
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ℓ	_
SHERIFF'S FEES	
Levying Attachment	6.00
Entering and returning same	•
Summoning Garnishee and making return	1.50
Summoning Garnishee and making return Serving Summons and other mesne process, and returning the same	1.50
Collecting execution for costs only	
Serving any summons not herein provided for, and making return	<i>a</i>
	TOTAL \$
GRAND TOTA	L\$\$.85
I respectfully call your attention to the above Court Cost Bill which	if not paid by,
19, it will be my unpleasant duty to issue execution on your property	
, , , , , , , , , , , , , , , , , , ,	J. D. Richardson, Clerk
	J while and the court of th

NOTICE of APPEAL

STATE OF ALABAMA, \ MOBILE COUNTY	
Merit Credit Corp. of Mobile, Inc. dba Merit Credit Co. #4	Committee of the Commit
Plaintiff VS.	
Bobby Lee Revells & Joan Revells, Box 326, Stapleton, Alabama Emp: Standard Furniture, Stapleton, Defendant	, Ala.
·	ee Revells & Joan Revells
in said Cause: Merit Gredit Gorp et al	VS Bobby Lee Revells & Joan Revells
Merit Credi	t Corp. of Mobile, Inc., dba
Merit Credit Co. #	14
a transfer to the Circuit Cou tained аххорожиким химх умерене обходожения	in the above entitled cause has prayed and ob- rt of Baldwin County, Alabama
from Neckerof the COURT OF GENERAL SESSI	ONS OF MOBILE COUNTY, and having
	in such cases made and provided, the same has Baldwin IT COURT of XMNKWK County, to be held for
said County, you are hereby notified accord	lingly.

M.W. Grehardson

Given under my hand this the 2 day of March 1970

Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 82820

Merit Credit Corp. of Mobile, Inc., dba Merit Credit Co. #4

Plaintiff,

VS

Bobby Lee Revells & Joan Revells,
Box 326, Stapleton, Alabama
EMP: Standard Furniture, Stapleton, Ala,
Defendant.

MSTEE

NOTICE OF ATAXAX

Returnable To The Circuit Court
OF BALDWIN GOUNTY, ALABAMA

Issued: March 2, 1970

Serve On: Bobby Lee Revells & Joan Revells