

BALDWIN NATIONAL BANK, A
Corporation,

Plaintiff,

VS

LOUIS DICHARA, MARY A.
DICHARA, NEAL A. GLEASON
and GENEVA A. GLEASON,

Defendants.

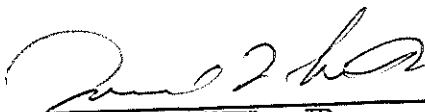
X IN THE CIRCUIT COURT OF
X
X BALDWIN COUNTY, ALABAMA
X

AT LAW

Case No. 9198

Comes now FRED F. SMITH, JR., attorney for the
Defendants in the above styled cause and files this motion
to abate the cause and as grounds therefore says as follows:

1. That the Defendant LOUIS DICHARA is the
principal maker upon the said note sued upon and that he
has filed a proceeding under Chapter XIII of the Bank-
ruptcy Act, United States District Court, Southern District
of Alabama, Case No. 29,209, and has subjected all of his
goods and wages to the jurisdiction of the ^{said} Bankruptcy Court
and the said Plaintiff is a listed creditor in the said
cause. Wherefore, the Defendants say that the said suit
should be abated and the Plaintiff required to file his
claim in the Chapter XIII Proceedings.



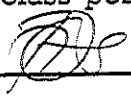
FRED F. SMITH, JR.
Attorney for the Defendants

ATTORNEY FOR PLAINTIFF:

Lloyd E. Taylor
61 N. Section Street
Fairhope, Alabama 36532

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 16
day of April, 1970, 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 first class postage prepaid.



FILED

APR 17 1970

ALICE J. DUCK

CLERK
REGISTER

1. The first part of the report is a general description of the project and its objectives. It includes a brief history of the project and a statement of the problem to be solved.

2. The second part of the report is a detailed description of the methodology used in the study. It includes a description of the data collection methods and the statistical analysis techniques used.

3. The third part of the report is a discussion of the results of the study. It includes a comparison of the results with the objectives of the project and a discussion of the implications of the findings.

4. The fourth part of the report is a conclusion and a list of references. The conclusion summarizes the main findings of the study and the references list the sources of information used in the study.

5. The fifth part of the report is a list of appendices. The appendices contain supplementary material that is too large to include in the main body of the report.

6. The sixth part of the report is a list of figures and tables. The figures and tables are used to present the results of the study in a clear and concise manner.

7. The seventh part of the report is a list of abbreviations. The abbreviations are used to simplify the language and to make the report easier to read.

8. The eighth part of the report is a list of symbols. The symbols are used to represent mathematical concepts and to make the report easier to read.

9. The ninth part of the report is a list of definitions. The definitions are used to clarify the meaning of the terms used in the report.

10. The tenth part of the report is a list of acknowledgments. The acknowledgments are used to thank the people who have helped in the study.

11. The eleventh part of the report is a list of references. The references are used to cite the sources of information used in the study.

12. The twelfth part of the report is a list of appendices. The appendices contain supplementary material that is too large to include in the main body of the report.

13. The thirteenth part of the report is a list of figures and tables. The figures and tables are used to present the results of the study in a clear and concise manner.

14. The fourteenth part of the report is a list of abbreviations. The abbreviations are used to simplify the language and to make the report easier to read.

15. The fifteenth part of the report is a list of symbols. The symbols are used to represent mathematical concepts and to make the report easier to read.

16. The sixteenth part of the report is a list of definitions. The definitions are used to clarify the meaning of the terms used in the report.

17. The seventeenth part of the report is a list of acknowledgments. The acknowledgments are used to thank the people who have helped in the study.

18. The eighteenth part of the report is a list of references. The references are used to cite the sources of information used in the study.

19. The nineteenth part of the report is a list of appendices. The appendices contain supplementary material that is too large to include in the main body of the report.

20. The twentieth part of the report is a list of figures and tables. The figures and tables are used to present the results of the study in a clear and concise manner.

21. The twenty-first part of the report is a list of abbreviations. The abbreviations are used to simplify the language and to make the report easier to read.

22. The twenty-second part of the report is a list of symbols. The symbols are used to represent mathematical concepts and to make the report easier to read.

998

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 COMMANDED TO SUMMON LOUIS DICHARA, MARY A. DICHARA, NEAL A. GLEASON AND GENEVA A. GLEASON TO APPEAR AND ANSWER, PLEAD OR DEMUR, WITHIN THIRTY DAYS FROM THE DATE HEREOF OF THIS SERVICE, TO THE BILL OF COMPLAINT FILED AGAINST THEM IN THE CIRCUIT COURT, AT LAW, FOR SAID COUNTY AND SAID STATE BY THE BALDWIN NATIONAL BANK, A CORPORATION.

HEREIN FAIL NOT, DUE RETURN MAKE OF THIS WRIT AS THE LAW DIRECTS.

WITNESS MY HAND THIS 3 DAY OF Apr 1970.

Alice J. Durr
REGISTER

BALDWIN NATIONAL BANK, A
CORPORATION,

PLAINTIFF

VS

LOUIS DICHARA,
MARY A. DICHARA,
NEAL A. GLEASON AND
GENEVA A. GLEASON

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO: 9198

COUNT ONE:

PLAINTIFF CLAIMS OF DEFENDANTS THE SUM OF SIX HUNDRED (\$600.00) DOLLARS, DUE BY PROMISSORY NOTE MADE BY THEM ON, HERETOFORE, TO-WIT, NOVEMBER 9, 1968, WHICH SUM OF MONEY, WITH INTEREST THEREON FROM, TO-WIT, DECEMBER 15, 1969 IS DUE AND UNPAID; AND PLAINTIFF AVER THAT IN AND BY THE TERMS OF SAID NOTE, THE DEFENDANTS 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 \$150.00 AS A REASONABLE SUM AS ATTORNEY FEES FOR BRINGING THIS SUIT FOR THAT THE DEFENDANTS 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.

FILED

APR 3 1970

ALICE J. DURR

CLERK
REGISTER

BAILEY & TAYLOR

BY: Blair E. Taylor
ATTORNEY FOR THE PLAINTIFF

Sheriff claims 200 miles at 20 cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
W. Wilkins
CLERK

Received 3 day of April 1920
and on 6 day of April 1920
I served a copy of the within D & C
on Paul & Emma Gleason

By service on _____
TAYLOR WILKINS, Sheriff
W. Wilkins D. S. 1

200 miles

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO: 9198

BALDWIN NATIONAL BANK, A
CORPORATION,

PLAINTIFF

VS

LOUIS DICHARA,
MARY A DICHARA,
NEAL A. GLEASON AND
GENEVA A. GLEASON

DICHARA:
108 McCONNELL AVE.
BAY MINETTE

GLEASON:
P.O.B. 461
GULF SHORES