

CLARENCE MANLEY, III et al, Ø IN THE CIRCUIT COURT OF
Plaintiff, Ø BALDWIN COUNTY, ALABAMA
Vs. Ø AT LAW
JAMES E. CRENSHAW, et al, Ø
Defendants. Ø NUMBER: 9199

Comes now Plaintiff in the above styled cause and demurs to the answer filed April 13, 1971 in this cause and to each separate and several answer therein assigns the following separate and several grounds:

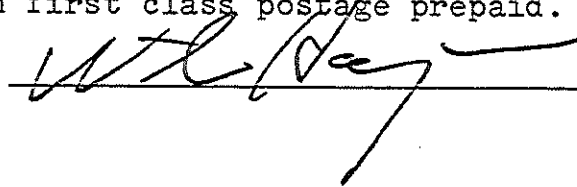
1. The answer does not constitute a defense.
2. The answer of Defendant, James E. Crenshaw, is immaterial.
3. The answer is multifarious.



Attorney for Plaintiff
Wilson Hayes

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 14th day of April, 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, with first class postage prepaid.



FILED

APR 14 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

EMMETT F. HILDRETH, JR.

ATTORNEY AT LAW

504 E. NASHVILLE AVE.
ATMORE, ALABAMA 36502

PHONE 368-3199
P. O. BOX 757

April 1, 1970

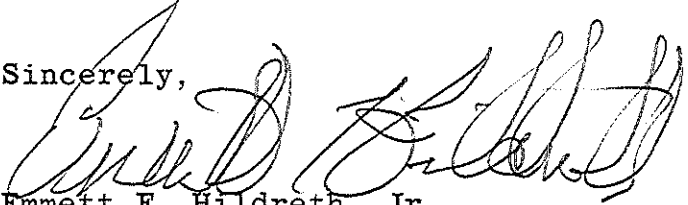
no. 9199

Hon. Alice Duck
Clerk of Circuit Court
BayMinnette, Alabama

Dear Mrs. Duck:

I am enclosing herein original and copy of Complaint
in the case of Manley vs. Crenshaw for filing in your
office and serving.

Sincerely,



Emmett F. Hildreth, Jr.

jw/EFH:JR

Enclosure

- ~~1. Alford, Ann B., Baldwin Times, Bay Minette~~
- ~~2. Allen, James B., Jr., Farmer, Lillian~~
- ~~3. Ballard, Lloyd J., Merchant, Bay Minette~~
4. Becker, Earl V., Mailman, Bay Minette
5. Becker, Ina H., Bookkeeper, Bay Minette
- ~~6. Page, Cornelia B., Housewife, Bay Minette~~
7. Lewis, Glen M., Salesman, Fairhope
8. Keegan, Jaan D., Housewife, Fairhope
- ~~9. Malbis, George, Garage Operator, Spanish Fort~~
- ~~10. Melton, Estelle, Housewife, Spanish Fort~~
11. Nelson, Clarence A., Merchant, Fairhope
- ~~12. Blackwell, Earl, Merchant, Foley~~
13. Brantley, Doris Stuart, Housewife, Bay Minette
- ~~14. Lipscomb, Edward, Farmer, Foley~~
- ~~15. Teem, Keeneth, Linesman, Foley~~
- ~~16. Pumphrey, Rex, Vulcan Signs, Foley~~
- ~~17. Rada, Gus F., Farmer, Silverhill~~
- ~~18. Ryan, Dorothy L., Housewife, Bay Minette~~
- ~~19. Stallworth, F. W., Painter, Summerdale~~
- ~~20. Strong, Charles W., Jr., Merchant, Bay Minette~~
- ~~21. Tenison, Ralph Bruce, Monuments, Bay Minette~~
22. Chestang, Pleham, D. Brookley Field, Bay Minette
23. Coleman, Daisy Nell, Vanity Fair, Perdido
24. Coleman, Maynard, Civil Service, Perdido
- ~~25. Cooper, Claude, Farmer, Rosinton~~
26. Russell M. Crawford, Electrician, Bay Minette
- ~~27. Deal, Harold L., State Of Alabama, Foley~~
- ~~28. Benson, E. L., Retired, Foley~~
- ~~29. Henry, J. W., Salesman, Fairhope~~
- ~~30. Hocutt, William B., Office Work, Fairhope~~
31. Holman, Walter C., Printer, Fairhope
- ~~32. H. S., Retired Fairhope~~
- ~~33. Irwin, E. L., Farmer, Foley~~
- ~~34. Thames, Grady, Farmer Robertsdale~~
- ~~35. Tenstall, Solomon, Laborer, Stockton~~
36. Brown, Hilard, Bay Minette, Alabama
- ~~37. Woodson, G. W., Retired, Bay Minette, Alabama~~
- ~~38. Bishop, Bobby Jean, Bookkeeper, Bay Minette, Alabama~~
- ~~39. Lipscomb, Lawrence, Farmer, Foley, Alabama~~

9199

Clarence Manley

vs.

Jas. Brenshaw

36
12
24
12
12 = 6
6

P. XXXXX X

D - XXXXX X

CLARENCE MANLEY, III,
d/b/a FOUR STATES AUTO
AUCTION,

Plaintiff,

vs.

JAMES E. CRENSHAW,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9199

ANSWER

Comes now the Defendant in the above styled cause and
for answer to the Plaintiffs Complaint, says:

1.

That he is not guilty of the matters alleged therein.

2.

Not guilty.

WILTERS & BRANTLEY

BY:

[Signature]
Attorneys for the Defendant

The Defendant demands a trial by jury.

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 4 day of May
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.

WILTERS & BRANTLEY

By:

FILED

MAY 12 1970

ALICE J. BUCK CLERK
REGISTER

SECRET

1. The purpose of this document is to provide information regarding the activities of the [redacted] in the [redacted] area. This information is being provided for your information and is not to be distributed outside of your office.

2. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.

3. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.

4. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.

5. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.

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6. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.

7. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.

8. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.

9. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.

10. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.

11. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.

12. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.

1. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.	Y	SECRET
2. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.	Y	SECRET
3. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.	Y	SECRET
4. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.	Y	SECRET
5. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.	Y	SECRET
6. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.	Y	SECRET
7. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.	Y	SECRET
8. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.	Y	SECRET
9. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.	Y	SECRET
10. The [redacted] has been identified as a [redacted] and is currently active in the [redacted] area.	Y	SECRET

10616

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STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA

You are hereby commanded to summon Doris Paul and J. R. Paul a/k/a Riley J. Paul a/k/a Riley Paul 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 Clarence Manley, III d/b/a Four States Auto Auction.

Witness my hand this the 11 day of January, 1971.
Defendants may be served:

2901 Edgewood
Mobile, Alabama

Alice J. Duck
Clerk

CLARENCE MANLEY, III, d/b/a FOUR STATES AUTO AUCTION, IN THE CIRCUIT COURT OF

Plaintiff, BALDWIN COUNTY, ALABAMA

Vs. AT LAW

JAMES E. CRENSHAW, NUMBER: 9199
Defendant.

Comes now Plaintiff Clarence Manley, III d/b/a Four States Auto Auction, and amends the Complaint heretofore filed in this cause to read as follows:

CLARENCE MANLEY, III, d/b/a FOUR STATES AUTO AUCTION, IN THE CIRCUIT COURT OF

Plaintiff, BALDWIN COUNTY, ALABAMA

Vs. AT LAW

JAMES E. CRENSHAW and JAMES E. CRENSHAW d/b/a CRENSHAW MOTORS, DORIS PAUL and J. R. PAUL a/k/a RILEY J. PAUL a/k/a RILEY PAUL, NUMBER: 9199

Defendants.

I

The Plaintiff claims of the Defendant Five Thousand Seven Hundred Seventy-five and No/100 (\$5,775.00) Dollars for money on the 18th day of September, 1969, received by the Defendants to the use of the Plaintiff, which sum of money with the interest thereon, is still unpaid.

FILED

JAN 11 1971

Wilson Hayes
Wilson Hayes, Attorney for Plaintiff

ALICE J. DUCK CLERK REGISTER

.VOL 66 PAGE 807

241-13-71

RECEIVED

JAN 11 1971

JAYLON WILKINS
SHERIFF

Buy

8522

Number: 9199

[Signature]

Clarence Manley, III, d/b/a
Four States Auto Auction,

Plaintiff,

Vs.

James E. Crenshaw and James
E. Crenshaw d/b/a Crenshaw
Motors, Doris Paul and J. R.
Paul a/k/a Riley J. Paul a/k/a
Riley Paul,

Defendants.

In the Circuit Court of
Baldwin County, Alabama
At Law

Defendants may be served:

2901 Edgewood
Mobile, Alabama

EXECUTED

This 13 day of Jan, 1971
by serving a copy of the within on

Doris Paul

RAY D. BRIDGES, Sheriff

By N. Busby D.S.

EXECUTED

This 13 day of Jan, 1971
by serving a copy of the within on

J.R. Paul aka Riley J. Paul etc

RAY D. BRIDGES, Sheriff

By N. Busby D.S.

JAN 12 9 37 AM '71
REC'D SHERIFF DEPT
MOBILE COUNTY, ALA.

CLARANCE MANLEY, III, d/b/a
FOUR STATES AUTO AUCTION,

Plaintiff,

vs.

JAMES E. CRENSHAW and JAMES
E. CRENSHAW d/b/a CRENSHAW
MOTORS, DORIS PAUL and J. R.
PAUL a/k/a RILEY J. PAUL,
a/k/a RILEY PAUL,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. 9199

Comes now, James E. Crenshaw, and for answer to the
Plaintiff's Complaint, says:

1.

That he is not guilty of the matters alleged therein.

2.

act The Defendant, James E. Crenshaw, further says that he
has never done business in the name of Crenshaw Motors. Further
that he never has been a licensed dealer in automobiles.

WILTERS & BRANTLEY

BY:

[Signature]
Attorney for Defendant James E.
Crenshaw

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 13 day of April
19 71 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.

WILTERS & BRANTLEY

by:

FILED

APR 13 1971

[Signature]
EUNICE B. BLACKMON CIRCUIT
CLERK

We the jury find for the Defendant
James E. Crenshaw..

Glenn Sawyer
Foreman

Glenn M. Lewis

RECEIVED

NOV 11 1960

U. S. DEPARTMENT OF JUSTICE

RECEIVED

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U. S. DEPARTMENT OF JUSTICE

NOV 11 1960

STATE OF ALABAMA

C I R C U I T C O U R T

COUNTY

TO ANY SHERIFF OF THE STATE OF
ALABAMA, GREETINGS:

You are hereby commanded to summon James E. Crenshaw,
Bay Minette, Alabama to appear in the Circuit Court of Baldwin
County, Alabama, at the place of holding the same and plead,
answer, or demur, within Thirty (30) days from service hereof
to the complaint of Clarence Manley, III, d/b/a Four States
Auto Auction, Plaintiff.

Witness this 4th day of April, 1978.

Alice J. Duck
CLERK.

* * * * *

C O M P L A I N T

CLARENCE MANLEY, III, d/b/a
FOUR STATES AUTO AUCTION,

PLAINTIFF.

vs.

JAMES E. CRENSHAW,

DEFENDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO: 9199.

COUNT ONE.

The Plaintiff claims of the Defendant Five Thousand
Seven Hundred Seventy-five and No/100 (\$5,775.00) Dollars for
money on the 18th day of September, 1969, received by the
Defendant to the use of the Plaintiff, which sum of money with
the interest thereon, is still unpaid.

FILED

APR 4 1970

ALICE J. DUCK

CLERK
REGISTER

James E. Crenshaw
ATTORNEY FOR PLAINTIFF.

806 A

Taylor Wilkins
Sheriff

ND. 9199

Clarence Manley III
4/b/c Four States Auto Auction

05.

James E. Crenshaw

Received 6 day of April 1920
and on 8 day of April 1920
I served a copy of the within Bill
on James E. Crawford

By service on _____

TAYLOR WILKINS, Sheriff
By Colbert D. S.
Crowns

Ten Cents per mile Total \$ 1.00
 TAYLOR WILKINS, Sheriff
 DEPUTY SHERIFF

DL

APR 1 1970

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 05-08-2001 BY 60322 UCBAW

CLERK
REGISTER

Emmett F. Hedrette

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

January 22, 1971

Clerk, Circuit Court
Baldwin County
Bay Minette, Alabama 36507

Dear Eunice:

Please file the enclosed amended complaint in
the case of Clarence Manley, III, d/b/a Four States Auto
Auction Vs. Crenshaw, et al.

With kind regards, I am

Yours very truly,


Wilson Hayes

WH/ms
Enc.

cc: Wilters & Brantley

CLARENCE MANLEY, III, d/b/a Ø IN THE CIRCUIT COURT OF
FOUR STATES AUTO AUCTION,

Plaintiff, Ø BALDWIN COUNTY, ALABAMA

Vs. Ø AT LAW

JAMES E. CRENSHAW and JAMES Ø
E. CRENSHAW d/b/a CRENSHAW
MOTORS, DORIS PAUL and J. R. Ø
PAUL a/k/a RILEY J. PAUL a/k/a
RILEY PAUL, Ø

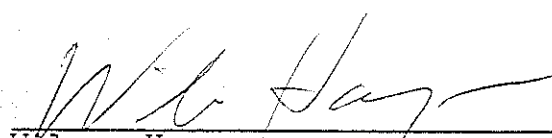
NUMBER: 9199

Defendants. Ø

Comes now Plaintiff in the above styled cause and amends
the Complaint heretofore filed in this cause as follows:

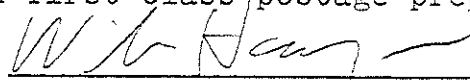
I

The Plaintiff claims of the Defendants Five Thousand
Seven Hundred Seventy-five and No/100 (\$5,775.00) Dollars for
money on the 18th day of September, 1969, received by the Defendants
to the use of the Plaintiff, which sum of money with the interest
thereon, is still unpaid.


Wilson Hayes
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 22 day of Jan,
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, with first class postage prepaid.



FILED

JAN 25 1971


Eunice B. Blackman
Clerk

We the jury find for the Plaintiff
and against the defendants, Morris Paul,
and J. R. Paul also known as
Riley J. Paul and also known as
Riley Paul and fix or assess
his damages at \$4907⁶⁰
plus 6 % interest for fifteen months

Attest

Foreman

9199

CLARENCE MANLEY, III, d/b/a
FOUR STATES AUTO AUCTION,

Plaintiff,

vs.

JAMES E. CRENSHAW and JAMES
E. CRENSHAW d/b/a CRENSHAW
MOTORS, DORIS PAUL and J. R.
PAUL a/k/a RILEY J. PAUL
d/b/a RILEY PAUL,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO: 9199

Comes now the Defendant, James E. Crenshaw, and files
the following demur to the Plaintiff's amended Complaint, and for
grounds thereof, says:

1.

That the Complaint does not allege which defendant the
Plaintiff is claiming the money sued on.

WILTERS & BRANTLEY

BY:

Henry J. Wilters
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 14 day of January,
1971 served a copy of the foregoing pleading in counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

BY:

FILED

JAN 14 1971

ALICE J. DUCK

CLERK
REGISTER