

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons E. S. Jackson, 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 the same, then and there to answer the complaint of Mable Frey.

Witness my hand, this the 20 day of Apr, 1970.

Alice J. Duck  
Clerk,

MABLE FREY,

Plaintiff,

vs.

E. S. JACKSON,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9225

1.

The Plaintiff claims of the Defendant, the sum of THREE HUNDRED THIRTY (\$330.00) DOLLARS, due from him by account on the 1st day of April, 1970, which sum of money with the interest thereon is still unpaid.

2.

The Plaintiff claims of the Defendant, the sum of THREE HUNDRED THIRTY (\$330.00) DOLLARS, for work and labor done for the Defendant by the Plaintiff from the 1st day of April, 1968 to the 1st day of April, 1970, at his request, which sum of money with the interest thereon is still unpaid.

WILTERS & BRANTLEY

BY: Alice J. Duck

Defendant's address is:  
417 8th Avenue South  
Birmingham, Alabama

FILED

APR 20 1970

ALICE J. DUCK CLERK  
REGISTER

VOL

66 PAGE 327

4/4-27-70

New Address  
P.O. Box 171  
Tuscaloosa, Ala.

RECEIVED

APR 21 1970

T. WILKINS  
SHERIFF

He don't live  
in this P.O. Box  
at P.O. - need  
Home address

Baldwin  
no. 9228

Mable Frey

Ves.

E. S. Jackson

417 8th Ave. S.

P.O. Box 171

No longer works

here

NOT FOUND in Jefferson County this the

APR 27 1970

day of \_\_\_\_\_ 196\_\_

MELVIN BAILEY, Sheriff

Jefferson County, Alabama

Melvin Bailey, Sheriff of  
Jefferson County, Alabama,

By \_\_\_\_\_ claims \$1.50 each for serving

\_\_\_\_\_ process(es) and \$1.00  
travel expense on each of

\_\_\_\_\_ process(es) or a total of

\$ \_\_\_\_\_

\_\_\_\_\_ Deputy Sheriff.

FILED

APR 20 1970

ALICE J. DUCK

CLERK  
REGISTER

Return to  
Baldwin Co.  
Bay Minette, Ala.

Isakom  
Wittor & Brantley

REC'D. SHERIFF'S  
DEPT. JEFF. CO.  
APR 22 11 08 AM '70

STATE OF ALABAMA

*and mail*  
*Case no 9225*

BALDWIN COUNTY

AFFIDAVIT

Personally appeared before me, the undersigned authority, Mable Frey, who after first being duly sworn, deposes and says: That she is the Plaintiff in the cause of action against E. S. Jackson, in the Circuit Court of Baldwin County, Alabama, at Law, case #9225, and that she believes that the Defendant E. S. Jackson is concealing himself so that process can not be served on him. Affiant further says that E. S. Jackson is over the age of twenty-one years, and he is a resident of Tuscaloosa, Alabama, whose Post Office Box is 171. She further says that she was informed at the Defendant's former place of business at Orange Beach, Alabama that he was working at the Vulcan Boat Works in Birmingham, Alabama, and that upon this information she caused this Complaint to be sent to Jefferson County for service upon the Defendant, and the same was returned "not found"; that upon receiving the letter from the said Jackson at an address of P. O. Box 171, Tuscaloosa, Alabama, she caused the Complaint to be served upon the Defendant, and the same was returned "not found", and that he did not live at that Post Office Box.

Witness my hand this the 24<sup>th</sup> day of July, 1970.

Mabel Frey  
Sworn to and subscribed before me on this the 24<sup>th</sup> day of July, 1970.

**FILED**

AUG 3 1970

**ALICE J. DUCK** CLERK  
REGISTER

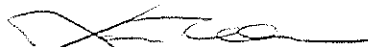
Carol L. Stallings  
Notary Public,

MABLE FREY,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
	)	
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
E. S. JACKSON,	)	AT LAW
	)	NO. 9225
Defendant.	)	

PLEA IN ABATEMENT

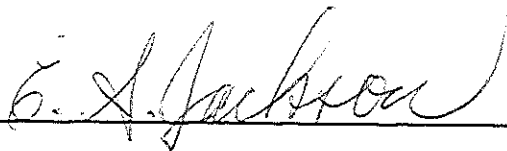
Now comes E. S. Jackson named as the defendant in the above styled cause, for the special purpose of filing the following plea separately to each count of the complaint in said cause, and for no other purpose:

The said E. S. Jackson says that at the time said suit was instituted and at the time said cause of action arose, he was a bona fide resident of the county of Tuscaloosa, State of Alabama, and that the Circuit Court of Baldwin County, Alabama, is without jurisdiction to try this suit.

  
 Attorney for Defendant

STATE OF ALABAMA    )  
                           \*  
 TUSCALOOSA COUNTY    )

Before me, the undersigned authority, within and for said County and State, personally appeared E. S. Jackson, the defendant in the above styled cause, who, being by me first duly sworn, says on oath, that the facts set forth in the foregoing plea are true and correct.

  
 \_\_\_\_\_

Sworn to and subscribed before me  
 on this the 10 day of September, 1970.

  
 Notary Public, Tuscaloosa County, Alabama

**FILED**

SEP 14 1970

**ALICE J. DUCK**   CLERK  
                           REGISTER



9225

FILED

PLEASE FURNISH SERVICE(S) INDICATED BY CHECKED BLOCK(S).  
REQUIRED FEE(S) PAID.

☐ Show to whom, date and address  
where delivered

☒ Deliver ONLY  
to addressee

RECEIPT

Received the numbered article described below.

REGISTERED NO.

SIGNATURE OR NAME OF ADDRESSEE (Must always be filled in)

CERTIFIED NO.

1

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

INSURED NO.

2

Deliver to Addressee Only

DATE DELIVERED

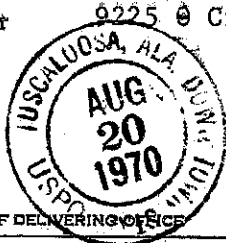
SHOW WHERE DELIVERED (only if requested)

3

AUG 20 1970

POST OFFICE DEPARTMENT  
OFFICIAL BUSINESS

0225 0 Civil



PENALTY FOR PRIVATE USE TO AVOID  
PAYMENT OF POSTAGE, \$300

POSTMARK OF DELIVERING OFFICE

Print your name and address below. If you want to restrict delivery, or to have the address of delivery shown on this receipt, check block(s) on other side. Moisten gummed ends and attach this card to back of article.

RETURN  
TO

Mrs. Alice J. Duck, Clerk  
P. O Box 239  
Bay Minette, Alabama

POD Form 3811 Apr. 1969 c83-16-7148-11