

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Eunice Blackmon

Bay Minette, Ala.

DATE

DATE April 19, 1971

Re: Associates Discount Corp. vs. Fred White and
Edward White. Civil Case No. 9262

Dear Mrs. Blackmon:

Mr. Daniel Robinson, Attorney, Foley, Ala. had
agreed that I was to receive a consent judgment in
the above captioned case. Please check on this.

Sincerely,

John V. Duck
(244)

SIGNED

*Note Edward White
Not found*

SIGNED

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO

Mrs. Alice J. Duck

DATE

Bay Minette, Ala.

DATE

May 19, 1970

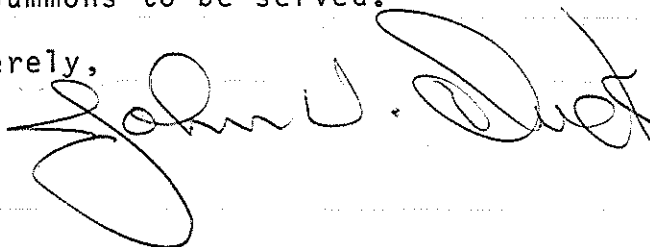
Re: ASSOCIATES DISCOUNT CORPORATION vs.

FRED WHITE and EDWARD E. WHITE

Dear Mrs. Duck:

Enclosed please find Bill of Complaint
to be filed, together with copies of same
and Summons to be served.

Sincerely,



SIGNED

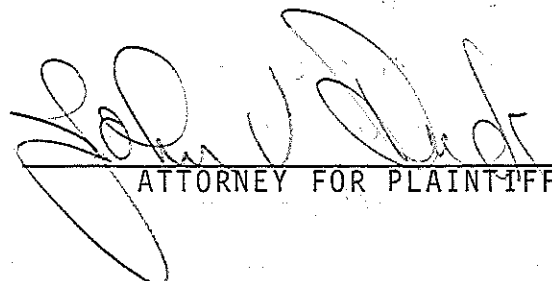
SIGNED

9262

ASSOCIATES DISCOUNT CORPORATION,)	IN THE CIRCUIT COURT OF
a corporation,)	BALDWIN COUNTY, ALABAMA
Plaintiff,)	AT LAW
vs.)	9262
FRED WHITE and EDWARD E. WHITE,)	
jointly and individually,)	
Defendants.)	

Plaintiff claims of the Defendants, the sum of EIGHT HUNDRED THIRTY-FOUR AND 01/100 (\$823.01) DOLLARS as damages for breach of a convential sales contract, executed by the Defendants on, to-wit: the 27th day of December, 1967, whereby the Plaintiff agreed to sell to the Defendants one 1962 White, 7400 TDB Model Tractor, Serial No. 629030, and the Defendants agreed to pay the purchase price.

Although the Plaintiff has complied with all of the provision on it's part, the Defendants have failed to pay the purchase price, and the amount due, after all credits, is EIGHT HUNDRED THIRTY-FOUR AND 01/100 (\$834.01) DOLLARS, and Plaintiff also asks for reasonable attorneys fee for collection as provided in the contract in the amount of ONE HUNDRED SIXTY AND 80/100 (\$160.80) DOLLARS.


 ATTORNEY FOR PLAINTIFF

FILED

MAY 21 1970

ALICE J. DUCK CLERK
 REGISTER

EXECUTED

This 15 day of Dec, 19 76
by serving a copy of the within on

Edward White

RAY D. BRIDGES, Sheriff

By C. L. Bridges D.S.

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon FRED WHITE and EDWARD E. WHITE

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.....

FRED WHITE and EDWARD E. WHITE Defendant.....

by ASSOCIATES DISCOUNT CORPORATION

Plaintiff.....

Witness my hand this 21 day of May 1970

Alice J. Duck Clerk

STATE OF ALABAMA

Baldwin County

SHERIFF

CIRCUIT COURT

ASSOCIATES DISCOUNT CORPORATION

a corporation,

Plaintiffs

vs.

FRED WHITE and EDWARD E. WHITE
Jointly & Ind.

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

MAY 21 1970

Clerk

ALICE J. DUCK

CLERK
REGISTER

JOHN V. DUCK

Plaintiff's Attorney

RETURNED

Not found in my County after diligent search and inquiry.

RAY D. BRIDGES, Sheriff

By L. Perkins D.S.

Tunnel Constructors
Melina

Defendant lives at
1308 Randall Ave., Daphne, Ala.
or 811 Trione Street, Daphne, Ala.
or Foley, Alabama

Received in Office

MAY 21 1970

19.....

SHERIFF

I have executed this summons

this 13 June 19.....

by leaving a copy with

Fred White

By
Stallor
Deputy Sheriff
lay of my county after diligent search and inq

Ray D. Bridges, Sheriff

Deputy Sheriff

EXECUTED

This 15 day of Dec, 19 76
by serving a copy of the within on

Edward A. White

RAY D. BRIDGES, Sheriff

By E. L. Bridges D.S.

ASSOCIATES DISCOUNT CORPORATION,)
a corporation,)

Plaintiff,)

VS.)

FRED WHITE and EDWARD E. WHITE,)
jointly and individually,)

Defendants.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

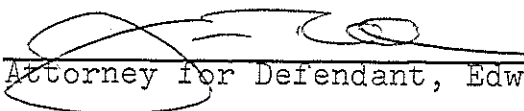
NO. 9262

PLEA

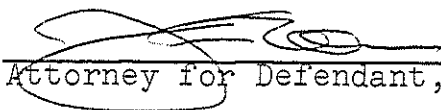
Now comes the defendant, Edward E. White, and for plea to the complaint heretofore filed in said cause, separately and severally, says:

1. He denies the allegations of the complaint.

2. For answer to the complaint, the defendant says that he has paid the debt for the recovery of which this suit was brought, before the action was commenced.


Attorney for Defendant, Edward E. White

The defendant, Edward E. White, demands a trial by jury of said cause.


Attorney for Defendant, Edward E. White

FILED

JAN 11 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State aforesaid _____ JOHN V. DUCK _____

who being duly sworn, on oath says, that a regular _____ April _____ Term
of the Circuit Court of Baldwin County, to-wit: on the _____ 21st _____ day of _____ April _____
19 71 _____ ASSOCIATES DISCOUNT CORPORATION _____

recovered a judgment against _____ FRED WHITE & EDWARD E. WHITE, jointly and indiv. _____

_____ for the sum of
NINE HUNDRED EIGHTY-FOUR (\$984.00) _____ Dollars

besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that
MOBILE TUNNEL CONSTRUCTORS _____

Mobile, Alabama _____

supposed to be indebted to or have effects of the said _____ FRED WHITE _____

in _____ its _____ possession, or under _____ its _____ control, and that he believes process of

Garnishment against said _____ MOBILE TUNNEL CONSTRUCTORS _____

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this _____ 15 _____

day of _____ Oct _____ A. D. 19 71 _____

_____ E. B. Blackmon _____
Clerk.

_____ Alice J. Duck _____

432-6713

NO. _____

CIRCUIT COURT

VS.

AFFIDAVIT
Garnishment on Judgment

Filed this _____ day of _____, 19____

Clerk.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State aforesaid _____
JOHN V. DUCK

who being duly sworn, on oath says, that a regular _____ April _____ Term
of the Circuit Court of Baldwin County, to-wit: on the _____ 21st _____ day of _____ April _____

19 _____ 71 _____ ASSOCIATES DISCOUNT CORPORATION

recovered a judgment against _____ FRED WHITE & EDWARD E. WHITE, jointly and indiv. _____

_____ for the sum of
NINE HUNDRED EIGHTY-FOUR (\$984.00) _____

_____ Dollars
besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that
MOBILE TUNNEL CONSTRUCTORS

_____ Mobile, Alabama

supposed to be indebted to or have effects of the said _____ FRED WHITE

in _____ its _____ possession, or under _____ its _____ control, and that he believes process of

Garnishment against said _____ MOBILE TUNNEL CONSTRUCTORS

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this _____

day of _____ A. D. 19 _____

Clerk.

