

## STATEMENT OF ACCOUNT

Creditor Drs. Carlin, Welter & Davis

Debtor E.H. Sutton Address Rt. 2 Box 315 Bay Minette, Ala.

Employment Standard Furniture Company Address Bay Minette, Ala.

patient,  
Patricia

Professional Services Rendered On Account \$ 84.00

Merchandise, Goods, Sold and Delivered On Account \$       

Date of Last Charge 2/12/68

Date of Last Payment ----

## SWORN STATEMENT OF CLAIM

STATE OF ALABAMA

COUNTY OF MOBILE

I hereby certify that the above account is just and correct and that all proper credits have been given and that the balance as indicated above is due and payable.

X *[Signature]*  
Drs. Carlin, Welter & Davis  
Affiant

Sworn and subscribed to before me this

10th day of April 19 70.

*[Signature]*  
Notary Public

My Commission Expires December 16, 1972

For value received, I (We) hereby transfer, sell, assign and set over unto Mobile Adjustment Service, Inc., all my (our) right, title and interest in and to the above claim.

X *[Signature]*  
Drs. Carlin, Welter & Davis

**STATEMENT OF ACCOUNT**  
**Drs. Barrett, Green & Tucker**

Creditor E.H. Sutton Address Rt. 2 Box 315 Bay Minette, Ala.  
 Debtor Standard Furniture Co. Address Bay Minette, Ala.  
 Employment \_\_\_\_\_  
 patient, Professional Services Rendered On Account \$ 212.00  
 Patricia Merchandise, Goods, Sold and Delivered On Account \$ —  
 Date of Last Charge 3-30-68  
 Date of Last Payment 3-30-68

**SWORN STATEMENT OF CLAIM**

STATE OF ALABAMA

COUNTY OF MOBILE

I hereby certify that the above account is just and correct and that all proper credits have been given and that the balance as indicated above is due and payable.

X

*James E. Barrett*  
 Drs. Barrett, Green & Tucker  
 Affiant

Sworn and subscribed to before me this

15 day of April 19 70.

*Mary C. Cox*  
 Notary Public

My Commission Expires

4-3-73

For value received, I (We) hereby transfer, sell, assign and set over unto Mobile Adjustment Service, Inc., all my (our) right, title and interest in and to the above claim.

X

*J. Barrett*  
 Drs. Barrett, Green & Tucker

## COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS  
COURTROOM "B" FIRST FLOORThe State of Alabama,  
MOBILE COUNTY

} TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon Patricia Sutton

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile  
County, on the 24 day of June, 1970 at the hour of 9:00 A.M.,  
then and there to answer a complaint of MOBILE ADJUSTMENT SERVICE, INC

of a debt or other demand not exceeding Seven Hundred Fifty Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this day of MAY 20 1970, 19

Clerk of the Court of General Sessions of Mobile County.

Cause of Action Plaintiff claims of the defendant \$296.00

due from him by account on 2-12-68 which  
sum of money with the interest thereon, is still  
unpaid. This suit is filed on an itemized verified  
account, which will be offered in evidence at trial.

ATTORNEY FOR PLAINTIFF

# COMPLAINT AND SUMMONS

GIBBONS & STOKES

Atty. for Plaintiff:

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY

No. 86729

Ret.

June 24, 1970

MOBILE ADJUSTMENT SERVICE, INC.

VS.

Patricia Sutton

Rt. 2, Box 315 Bay Minette Ala

~~Emp. Standard Furniture Co. Bay Minette Ala.~~  
Continued To

Executed by Service on

Defendant

This ..... day ....., 19.....

Sheriff of Mobile County

By .....  
Deputy Sheriff

COURT OF GENERAL  
SESSIONS  
MAY 19 11 26 AM '70

## COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS  
COURTROOM "B" FIRST FLOORThe State of Alabama,  
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon Patricia Suttonto be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile County, on the 24 day of June, 1970 at the hour of 9:00 A.M.,  
then and there to answer a complaint of MOBILE ADJUSTMENT SERVICE, INC

of a debt or other demand not exceeding Seven Hundred Fifty Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this \_\_\_\_\_ day of \_\_\_\_\_, 1970

MAY 20 1970

J. D. Richardson  
Clerk of the Court of General Sessions of Mobile County.Cause of Action plaintiff claims of the defendant \$296.00  
due from him by account on  
sum of money with the interest thereon, is still  
unpaid. This suit is filed on an itemized verified  
account, which will be offered in evidence at trialB. Z. Blakely  
ATTORNEY FOR PLAINTIFF

24

# NOTICE of ~~RECALL~~

TRANSFER

STATE OF ALABAMA, }  
MOBILE COUNTY }

Mobile Adjustment Service

Plaintiff

VS.

Patricia Sutton  
Rt. 2, Box 315, Bay Minette, Alabama

Defendant

To Patricia Sutton

in said Cause: Mobile Adjustment Service VS. Patricia Sutton

You are hereby notified that

Mobile Adjustment Service

the Plaintiff in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, ~~an appeal from the judgment therein rendered by~~ from the COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having complied with the requirements of the law in such cases made and provided, the same has been granted to the next term of the CIRCUIT COURT of Mobile County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 30 day of June 19 70

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

*Mail*

9367  
86729

Case No. \_\_\_\_\_

*E*

Mobile Adjustment Service

Plaintiff,

VS

*Paul  
A*

Patricia Sutton

Rt. 2, Box 315, Bay Minette, Alabama

Defendant.

TRANSFER

NOTICE OF ~~APPEARANCE~~

Returnable To The Circuit Court  
OF Baldwin County, Alabama

Issued: June 30, 1970

Serve On: Patricia Sutton

MOBILE SHERIFF DEPT.  
MOBILE COUNTY, ALA.

JUN 30 4 52 PM '70

BY \_\_\_\_\_

Received 6 day of July 1970  
and on 13 day of July 1970  
I served a copy of the within Notice of Transfer  
on Patricia Sutton

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
*W. A. Wilkins*  
D. S.



WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

June 15, 1970

Clerk, General Sessions  
Mobile County  
Mobile, Alabama

# 86729

Dear Sir:

Please file the enclosed Plea In Abatement  
in Case #2780-162806, Mobile Adjustment Service, Inc.  
vs Patricia Sutton.

With kind regards, I am

Yours very truly,

  
Wilson Hayes

296  
346

WH/ms  
Enc.

Cy to: Mr. Ben F. Stokes, III

MOBILE ADJUSTMENT SERVICE,  
INC.

PLAINTIFF

VS

PATRICIA SUTTON

DEFENDANT

COURT OF GENERAL SESSIONS

MOBILE COUNTY, ALABAMA

CASE NO. 2780-162806

PLEA IN ABATEMENT

Comes now the Defendant in the above styled cause by her Attorney, Wilson Hayes, and makes her appearance in this cause specially and only for the purpose of making the following plea:

1. Plaintiff ought not to have and maintain the above styled cause for that Defendant is now and was at the time of the filing of this cause a resident citizen of Baldwin County, Alabama.

2. Plaintiff ought not to have and maintain its suit in this cause for that Defendant is not now and never has been a resident of Mobile County, Alabama.

3. Plaintiff ought not to have and maintain its suit in the above styled cause for that Defendant resides in and has always resided in Bay Minette, Baldwin County, Alabama and that Plaintiff well knows this fact, that the said address given for service is Defendant's address in Bay Minette, Baldwin County, Alabama.

Wilson Hayes  
Attorney for Defendant

STATE OF ALABAMA  
BALDWIN COUNTY

Before me, the undersigned authority, this day personally appeared Wilson Hayes, who is known to me and who being by me first duly sworn to speak the truth, deposes and says he has read the foregoing instrument and knows the facts therein stated are true to the best of his information and belief.

Wilson Hayes  
Wilson Hayes

Sworn to and subscribed before me this the 15th day of June, 1970.

Sworn to and subscribed before me this the 15th day of June, 1970.

COURT OF GENERAL  
SESSIONS

Mary C. Stiers  
Notary Public,

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 15th day of June, 1970, served a copy of the foregoing instrument on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, with first class postage prepaid.

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GIBBONS & STOKES

ATTORNEYS AT LAW  
160 CONGRESS STREET  
MOBILE, ALABAMA  
TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III  
WILLIAM L. HOWELL

June 19, 1970

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA 36601

Hon. J. D. Richardson, Clerk  
Court of General Sessions  
Mobile County Courthouse  
Mobile, Alabama

*JP* 86729

Re: Mobile Adjustment Service, Inc. (Mul) vs. Patricia  
Sutton, Case No. ? (suit filed on about May 20, 1970)

Dear Sir:

Attorney Wilson Hayes of Bay Minette represents the defendant and you may enter his name on the docket sheet. Venue is improper and, therefore, I request an order transferring the case to the Circuit Court of Baldwin County. Your kind attention will be appreciated.

Sincerely,

*B. F. Stokes, III*  
B. F. Stokes, III

BFS/ee  
cc: Wilson Hayes, Esq.

COURT OF GENERAL  
SESSION  
JUN 23 12 59 PM '70

# COST BILL

*Stokes*  
ATTORNEYS FOR PLTF:—

General Sessions (Civil Div.) Court of Mobile, Mobile County Court House, Mobile, Ala.

*Mobile Adjustment Service*

*Patricia Sutton*  
Plaintiff  
Defendant

CASE NO. *86129*

Garnishee

## COURT FEES

Summons and proceedings thereon to judgment

\$1.00

Docketing each cause

.10

Law Library Fee

1.00

Garnishment

TOTAL \$

## SHERIFF'S FEES

Levying Attachment

6.00

Entering and returning same

.25

Summoning Garnishee and making return

1.50

Serving Summons and other mesne process, and returning the same

1.50

Collecting execution for costs only

1.50

Serving any summons not herein provided for, and making return

1.50

TOTAL \$

GRAND TOTAL

\$

*6.35*

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 for the recovery of the same.

J. D. Richardson, Clerk

THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY, ALABAMA

Case No. 86729

Mobile Adjustment Service  
Plaintiff

VS

Patricia Sutton  
Defendant

Amount of Claim: 296.00

Filed: May 19, 1970

Issued: May 20, 1970

Returnable: June 24, 1970

Service Had: 5-26-70

Cause of Action: IVA

Attorney for Plaintiff: Gibbons & Stokes

Attorney for Defendant: Wilson Hayes (Bay Minette)

6-16-70 Plea in Abatement filed.

6-24-70 Motion Granted, Cause transferred to Circuit Court of Baldwin County, Alabama.

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 30TH DAY OF JUNE, 1970.

*J. D. Richardson*  
CLERK OF THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY, ALABAMA.

# NOTICE of ~~APPEAL~~

STATE OF ALABAMA, )  
MOBILE COUNTY )

TRANSFER

Mobile Adjustment Service

Plaintiff

VS.

Patricia Sutton

Rt. 2, Box 315, Bay Minette, Alabama

Defendant

To Patricia Sutton

in said Cause: Mobile Adjustment Service VS Patricia Sutton

You are hereby notified that

Mobile Adjustment Service

the Plaintiff in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, ~~and appeal from the judgment there rendered by~~ from the COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having complied with the requirements of the law in such cases made and provided, the same has been granted to the next term of the CIRCUIT COURT of Mobile County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 30 day of June 1970

*J. D. Richardson*  
Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 86729

Mobile Adjustment Service

Plaintiff,

VS

Patricia Sutton

Rt. 2, Box 315, Bay Minette, Alabama

Defendant.

**TRANSFER**

**NOTICE OF ~~XXXXXX~~**

Returnable To The Circuit Court

OF Baldwin County, Alabama

Issued: June 30, 1970

Serve On:

Patricia Sutton

**FILED**

JUL 1 1970

**ALICE J. DUCK**

CLERK  
REGISTER