

J. V. GRAHAM,

Plaintiff,

VS

CITY OF FAIRHOPE, a municipal corporation, A.B.C. Corporation, A.C.C., the legal entity who maintained, supplied, supervised, the electrical facilities supplying electricity to the house of J. V. Graham on, to-wit, June 6, 1969 who are unknown at the present time but will be added by amendment when ascertained, jointly and individually,

Defendants.

X
X
X
X
X
X
X
X
X

IN THE COURT OF

GENERAL SESSIONS OF

MOBILE COUNTY, ALABAMA

CASE NO. 88149

PLEA IN ABATEMENT

Comes the Defendant, THE CITY OF FAIRHOPE, and shows to the Court that it is a municipal corporation, located at Fairhope, Baldwin County, Alabama, and shows to the Court that it does not do business by agents in Mobile County, and that it did not do business by agent in Mobile County at the time this cause of action arose and that it does not do business by agent in Mobile County.

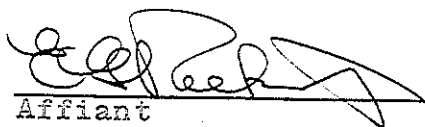
WHEREFORE, Defendant pleads that this cause be abated under Section 60, of Title 7 of the Code of Alabama.



ATTORNEY FOR DEFENDANT

STATE OF ALABAMA,
COUNTY OF BALDWIN.

Before me, the undersigned Notary Public, personally appeared E. G. RICKARBY, who, being duly sworn, deposes and says that the facts stated in the foregoing Plea in Abatement are true and correct to the best of his own personal knowledge.



Affiant

Subscribed and Sworn to before me this
31 day of July, 1970.


Notary Public, Baldwin County, Alabama.

CERTIFICATE OF SERVICE

This is to certify that I have this day served c
opposing party in the foregoing matter with a copy c
by depositing in the United States Mail a copy of
envelope with adequate postage prepaid the con
addressed.
This 31st day of July, 1970

E. G. RICKARBY

Attorney for
P. O. Box 471, Fairhope, Ala. 36522

1. The first part of the document is a list of names and addresses of the members of the committee.

2. The second part of the document is a list of names and addresses of the members of the committee.

3. The third part of the document is a list of names and addresses of the members of the committee.

4. The fourth part of the document is a list of names and addresses of the members of the committee.

MEMBERS OF THE COMMITTEE

1. The first part of the document is a list of names and addresses of the members of the committee.

2. The second part of the document is a list of names and addresses of the members of the committee.

3. The third part of the document is a list of names and addresses of the members of the committee.

4. The fourth part of the document is a list of names and addresses of the members of the committee.

5. The fifth part of the document is a list of names and addresses of the members of the committee.

88149

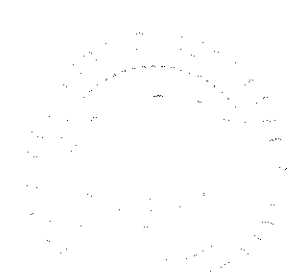
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Case No. 88149

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16-9-54-6-70

COST BILL

J. D. Richardson
ATTORNEYS FOR PLTF:—

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

J. V. Graham
Plaintiff

City of Turin, Ala.
Defendant

CASE NO. *88149*

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 \$ *13.55*

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

TRANSFER

NOTICE of ~~ABANDONMENT~~

STATE OF ALABAMA, }
MOBILE COUNTY }

J. V. Graham

Plaintiff

VS.

City of Fairhope et al

Defendant

To City of Fairhope et al

in said Cause: J. V. Graham VS City of Fairhope et al

You are hereby notified that

J. V. Graham

the Plaintiff in the above entitled cause has prayed and obtained a transfer to The Circuit Court of Baldwin County, Alabama, from ~~an appeal from the judgment rendered by~~ 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~~ Baldwin, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 25 day of August 1970

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

Case No. 88149

J. V. Graham

Plaintiff,

VS

City of Fairhope et al
City Hall, Fairhope, Alabama

Defendant.

TRANSFER
NOTICE OF APPEAL

Returnable To The Circuit Court
OF Baldwin County

Issued: August 25, 1970

Serve On: City of Fairhope or Attorney E. G. Rickarby, Fairhope, Alabama

TRANSFER

NOTICE of ~~ABSENCE~~STATE OF ALABAMA, {
MOBILE COUNTY }

J. V. Graham

Plaintiff

VS.

City of Fairhope et al

Defendant

To City of Fairhope et al

in said Cause: J. V. Graham VS City of Fairhope et al

You are hereby notified that:

J. V. Graham

the Plaintiff in the above entitled cause has prayed and obtained a transfer to The Circuit Court of Baldwin County, Alabama, ~~and a transfer from the judgment of the above entitled cause to the~~
from

~~the~~ 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 Baldwin said County, you are hereby notified accordingly.

Given under my hand this 25 day of August 1970

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

Case No. 88149

J. V. Graham

Plaintiff,

VS

City of Fairhope et al
City Hall, Fairhope, Alabama

Defendant.

TRANSFER
NOTICE OF ~~ARREST~~

Returnable To The Circuit Court
OF Baldwin County

Issued: August 25, 1970

Serve On: City of Fairhope or Attorney E. G. Rickarby, Fairhope, Alabama

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Received 21 day of Aug 19 76
and on 29 day of Aug 19 70
I served a copy of the within Notice of transfer
on City of Fairhope HUG 25 2 15 PM '70

BY

Sheriff claims 70.00 miles at

Ten Cents per mi. Total \$ 7.00

TAYLOR, W. KING, Sheriff

BY W. King DEPUTY SHERIFF

D. S.