

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Bay Minette Home & Auto Center, Inc., a corporation, 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 J. L. Mothershead.

WITNESS my hand this 31st day of August, 1970.

Alice J. Duck  
Clerk

Defendant may be served by serving a copy on Rhea T. Davis, Secretary of defendant corporation.

\* \* \* \* \*

J. L. MOTHERSHEAD,

Plaintiff,

VS.

BAY MINETTE HOME & AUTO  
CENTER, INC., a corporation,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

9459

C O M P L A I N T

COUNT ONE

The plaintiff claims of the defendant Three Thousand One Hundred Fifty-three and 45/100 Dollars (\$3,153.45) due by promissory note made by it on the 15th day of January, 1969, and payable in sixty equal monthly installments of \$69.31 each, with interest thereon. Plaintiff avers that the said note provided that in the event it was placed in the hands of an attorney for collection or suit was brought on the same, the defendant agreed to pay a reasonable attorney's fee and costs of collection, which fee plaintiff avers to be \$450.00 and which it herewith claims.

COUNT TWO

Plaintiff claims of the defendant Sixty-four and 93/100 Dollars (\$64.93) from it by account on the 5th day of September, 1969, which sum of money, with the interest thereon, is still unpaid.

FILED

AUG 31 1970

[Signature]  
Attorney for Plaintiff

CLERK  
REGISTER

A  
ALICE J. DUCK

96795

9459

J. L. Mothershead

vs.

Bay Minette Home  
& Auto Center Inc.

By service on

I served a copy of the within on Phel A. Martin (Sec.)

Received 3 day of Sept 1970  
and on 3 day of Sept 1970

FILED

AUG 31 1970

ALICE J. DUCK CLERK  
REGISTER

J. R. Allen

TAYLOR WILKINS, Sheriff  
By W. C. Allen

ANSWER

J. L. MOTHERSHEAD,

Plaintiff,

VS.

BAY MINETTE HOME & AUTO  
CENTER, INC., a corporation,

Defendant.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW  
CASE NO. 9459

1.

The Defendant, for answer to said Complaint, says it has  
paid the debt sued on before this action was commenced.

WILTERS & BRANTLEY

BY:

Solomon M Brantley  
Attorneys for Defendant

The Defendant demands a trial by jury.

WILTERS & BRANTLEY

BY:

Solomon M Brantley  
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 10 day of Sept  
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:

Solomon M Brantley

**FILED**

SEP 11 1970

**ALICE J. DUCK**

CLERK  
REGISTER

OWEN AND BALL  
ATTORNEYS AT LAW  
410 COURTHOUSE SQUARE  
BAY MINETTE, ALABAMA 36507

JAMES R. OWEN  
E. E. BALL

TELEPHONE  
(205) 937-9503  
P. O. DRAWER C

February 5, 1976

C  
O  
P  
Y  
Mr. T. M. Byrd  
Baldwin County Sheriff's Office  
Baldwin County Courthouse  
Bay Minette, Alabama 36507

Re: Case #9459 and #9460

Dear Tom:

The Defendants in the above two cases, John Z. Davis and Aurellia Davis live at the intersection of Pinegrove Road on Highway 31 South just out of Bay Minette.

It is my understanding that they own the property they live on and that they have personal property located on the premises. I would appreciate it if you would see if there is anything which can be levied on in satisfaction of the judgments and costs in the above cases.

With best regards, we are

Yours very truly,

OWEN AND BALL

BY:   
E. E. BALL

EEB/sh

cc: Mrs. Eunice Blackmon, Clerk  
Baldwin County Courthouse  
Bay Minette, Alabama 36507

FILED

FEB 6 1976

EUNICE B. BLACKMON CIRCUIT CLERK