

EARL GILLIAN  
Attorney At Law  
Suite 206, Moore Building  
MONTGOMERY, ALA. 36104

July 13, 1971

Mrs. Eunice Blackman  
Clerk of the Circuit Court  
P.O. Box 239  
Bay Minette, Alabama

Re: Woolco Dept. Store vs. Mrs.  
Joyce Blackwell  
Case #9526

Dear Mrs. Blackman:

As per our conversation today, please dismiss the above styled suit for me and send the cost bill to me.

Mr. Richard C. Lacey of Fairhope, Alabama represents the defendant. We have agreed to have this case dismissed. Your cooperation in this matter will be appreciated.

Yours very truly,

*Earl Gillian*

Earl Gillian

EG/jgg

WOOLCO DEPARTMENT STORE, \* IN THE CIRCUIT COURT OF  
Plaintiff, \* BALDWIN COUNTY, ALABAMA  
VS. \* CASE NO. 9526  
MRS. JOYCE BLACKWELL a/k/a, \*  
MRS. O. E. PANNELL, \*  
Defendant \*

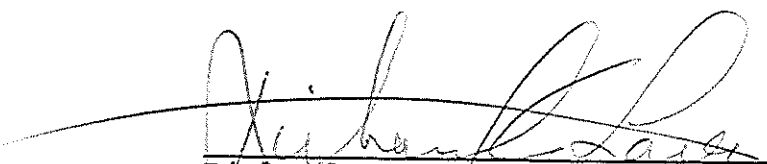
A N S W E R

STATE OF ALABAMA


BALDWIN COUNTY

Comes now the Defendant in the above styled cause and files this her answer to said Bill of Complaint and each and every count thereof:

1. Not Guilty.
2. The General Issue.
3. The Defendant is not guilty of the matters alleged therein.

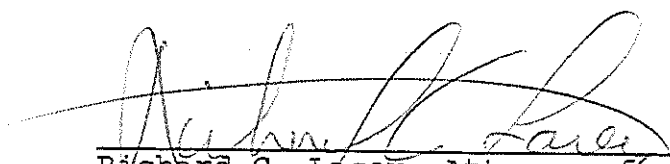
  
Richard C. Lacey, Attorney For  
Defendant.

Defendant respectfully demands trial  
by jury.

  
Richard C. Lacey, Attorney For  
Defendant.

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 23rd day of November, 1970, served a copy of the foregoing Answer on Counsel for Plaintiff, Mr. Earl Gillian, by mailing the same by United States Mail, properly address, and first class postage prepaid.

  
Richard C. Lacey, Attorney for  
Defendant.

Richard C. Lacey  
Attorney At Law  
P. O. Box A-J  
Fairhope, Alabama 36532

**FILED**

NOV 25 1970

**ALICE J. DUCK** CLERK  
REGISTER

9526  
Sunny

# The State of Alabama

MONTGOMERY, COUNTY  
Baldwin

Know all Men by these Presents, That we Woolco Department Store

are held and firmly bound unto Mrs. Joyce Blackwell, a/k/a Mrs. O.E. Pannell  
in the sum of Eight hundred (\$800.00) and no/100. . . . . Dollars,  
to be paid to the said Mrs. Joyce Blackwell, a/k/a Mrs. O.E. Pannell  
Heirs, executors, administrators, or assigns; for which payment well and truly to be made, we bind our-  
selves, and each of us, our and each of our heirs, executors and administrators, jointly and severally, and  
firmly, by these presents. Sealed with our seals, and dated this 28<sup>th</sup> day of October in the  
year of our Lord, One Thousand Nine Hundred and Seventy.

The condition of the above obligations is such, that whereas the above bound Woolco Department Store  
on the day of the date hereof, hath obtained at the suit of Woolco Department Store vs. Mrs.  
Joyce Blackwell, a/k/a Mrs. O.E. Pannell  
a Summons and Complaint for the recovery of personal chattels in specie against and asks an  
endorsement by the Clerk of this Court "That the Sheriff is required to take the property mentioned in said  
complaint into his possession," as required by law in such cases, which Summons and Complaint are return-  
able to the next term of the Circuit Court of Montgomery for said County and which said endorsement is  
made upon the Plaintiff entering into this Bond.

Now, if the said Plaintiff shall fail in this suit, and shall pay the Defendant all such costs and damages  
as she may sustain by reason of the wrongful complaint in said case, then this obligation to be void,  
otherwise to remain in full force and effect.

Woolco Department Store By (L. S.)  
William T. McHenry (L. S.)  
J. R. Matthews (L. S.)

Approved this  
day of

19 70

Clerk.

State of Alabama  
Montgomery County

I, John R. Matthews, Clerk of the Circuit Court of Montgomery County,  
Alabama, hereby certify that this is a good and sufficient bond and if  
presented to me in this County, I would approve the same.

This the 28th day of October, 1970.

John R. Matthews  
Circuit Clerk

THE STATE OF ALABAMA

Montgomery County  
Baldwin

Alice J. Duck

Baldwin

Before me, ~~John R. Matthews~~, Clerk of the Circuit Court of ~~Montgomery~~ County, in and for said County,  
personally appeared Woolco Department Store by Barry Rhodes, <sup>as last signed</sup> who being duly  
sworn, depose and saith, That the property sued for in the complaint of

Woolco Department Store vs. Mrs. Joyce Blackwell, a/k/a Mrs. O.E. Pannell:  
One Whirlpool Dryer, Model No. LTE; Serial No. 990AU

belongs to Woolco Department Store  
the said Plaintiff.

to-wit:

Sworn to and subscribed before me this

28 day of October 1970  
John R. Matthews  
Clerk.

Barry Rhodes audit mrg  
Woolco Department Store  
by Barry Rhodes

DENTINUE BOND AND  
AFFIDAVIT

Woolco Department Store

vs.

Mrs. Joyce Blackwell  
a/k/a Mrs. O.E. Pannell  
109 Gaston Street  
Fairhope, Alabama

Baldwin  
Circuit Court of Montgomery  
County

Filed in office

day of \_\_\_\_\_, 19

Clerk.

# The State of Alabama

MONTGOMERY COUNTY

Baldwin

Know all Men by these Presents, That we Woolco Department Store

are held and firmly bound unto Mrs. Joyce Blackwell, a/k/a Mrs. O.E. Pannell

in the sum of Eight hundred (\$800.00) and no/100. . . . . Dollars,

to be paid to the said Mrs. Joyce Blackwell, a/k/a Mrs. O.E. Pannell

Heirs, executors, administrators, or assigns; for which payment well and truly to be made, we bind ourselves, and each of us, our and each of our heirs, executors and administrators, jointly and severally, and firmly, by these presents. Sealed with our seals, and dated this 28<sup>th</sup> day of October in the year of our Lord, One Thousand Nine Hundred and Seventy.

The condition of the above obligations is such, that whereas the above bound Woolco Department Store on the day of the date hereof, hath obtained at the suit of Woolco Department Store vs. Mrs. Joyce Blackwell, a/k/a Mrs. O.E. Pannell a Summons and Complaint for the recovery of personal chattels in specie against and asks an endorsement by the Clerk of this Court "That the Sheriff is required to take the property mentioned in said complaint into his possession," as required by law in such cases, which Summons and Complaint are returnable to the next term of the Circuit Court of ~~Montgomery~~ Baldwin for said County and which said endorsement is made upon the Plaintiff entering into this Bond.

Now, if the said Plaintiff shall fail in this suit, and shall pay the Defendant all such costs and damages as she may sustain by reason of the wrongful complaint in said case, then this obligation to be void, otherwise to remain in full force and effect.

Woolco Department Store By (L. S.)

*William L. Baldwin* (L. S.)

*[Signature]* (L. S.)

Approved this  
day of

19 70

Clerk.

State of Alabama  
Montgomery County

I, John R. Matthews, Clerk of the Circuit Court of Montgomery County, Alabama, hereby certify that this is a good and sufficient bond and if presented to me in this County, I would approve the same.

This the 28th day of October, 1970.

*John R. Matthews*  
Circuit Clerk

THE STATE OF ALABAMA

Montgomery County  
Baldwin

Alice J. Duck

Baldwin

Before me, ~~John R. Matthews~~, Clerk of the Circuit Court of ~~Montgomery~~ County, in and for said County,  
personally appeared Woolco Department Store by Barry Rhodes who being duly  
sworn, deposeth and saith, That the property sued for

in the complaint of

Woolco Department Store vs. Mrs. Joyce Blackwell, a/k/a Mrs. O.E. Pannell:  
One Whirlpool Dryer, Model No. LTE; Serial No. 990AU

belongs to Woolco Department Store  
the said Plaintiff.

to-wit:

Sworn to and subscribed before me this

28 day of October 1970  
John R. Matthews  
Clerk.

Barry Rhodes Credit mg.  
Woolco Department Store by  
Barry Rhodes

DENTINUE BOND AND  
AFFIDAVIT

Woolco Department Store

vs.  
Mrs. Joyce Blackwell  
a/k/a Mrs. O.E. Pannell  
109 Gaston Street  
Fairhope, Alabama

Circuit Court of ~~Montgomery~~  
Baldwin  
County

Filed in office

day of \_\_\_\_\_, 19\_\_\_\_

Clerk.

9526

THE STATE OF ALABAMA }  
Montgomery County  
Baldwin

To any Sheriff of the State of Alabama—GREETING:

You are Hereby Commanded to Summon

Mrs. Joyce Blackwell, a/k/a Mrs. O.E. Pannell

Baldwin

to appear before the Circuit Court of ~~Montgomery~~, in and for said County, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur or plead to the complaint of

Woolco Department Store

And you are hereby commanded to execute this process instanter and make return as required by law.

Witness my hand this 30 day of Oct

1970  
Alice J. Duck Clerk

COMPLAINT

THE STATE OF ALABAMA  
Baldwin County  
Montgomery, Alabama  
Woolco Department Store

VS.

Baldwin  
In the Circuit Court of ~~Montgomery~~  
County  
Mrs. Joyce Blackwell, a/k/a  
Mrs. O.E. Pannell

Term, 19 70

Plaintiff

Defendant

The plaintiff claim of the Defendant

One Whirlpool Dryer, Model No., LTE; Serial No. 990AU.

Carl Gillian  
Attorney for Plaintiff

FILED

OCT 30 1970

ALICE J. DUCK CLERK  
REGISTER



THE STATE OF ALABAMA

Montgomery County  
Baldwin

To the Sheriff of Said County—GREETINGS:

The Plaintiff having given bond and made affidavit as required by law, you are hereby required to take the property mentioned in the complaint into your possession, unless the defendant give bond, payable to the Plaintiff, with security in double value of the property, conditioned that if the Defendant is cast in the suit he will, within thirty days thereafter, deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

WITNESS my hand this 30 day of Oct

A. D., 1970

Chief S. Duck  
Clerk, Circuit Court, Montgomery County.  
Baldwin

No. 9526

Woolco Department Store

vs.

Mrs. Joyce Blackwell  
a/k/a Mrs. O.E. Pannell  
109 Gaston Street  
Fairhope, Alabama

CIRCUIT COURT  
Baldwin

OF MONTGOMERY COUNTY

Term, 19 70

SUMMONS AND  
COMPLAINT

Filed in office this day of

FILED

A. D. 19

OCT 30 1970

Clerk.

ALICE J. DUCK  
CLERK  
REGISTER  
Plaintiff's Attorney

Carol Lillian  
Hill Bldg. 5. Court St.  
Montgomery

Received in office 30 day of

19 70

Taylor Wilkins Sheriff

Executed by serving 1 copy  
of the within. Summons and Complaint on  
Defendant this the 31 day of  
OCT. 19 70

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Sheriff

Sheriff claims 10 miles at  
Ten Cents per mile Total \$ 2.00  
TAYLOR WILKINS, Sheriff  
BY ALICE J. DUCK  
DEPUTY SHERIFF

9526

# The State of Alabama

~~MONTGOMERY~~ COUNTY  
Baldwin

Know all Men by these Presents, That we Woolco Department Store

are held and firmly bound unto Mrs. Joyce Blackwell, a/k/a Mrs. O.E. Pannell  
in the sum of Eight hundred (\$800.00) and no/100. . . . . Dollars,  
to be paid to the said Mrs. Joyce Blackwell, a/k/a Mrs. O.E. Pannell  
Heirs, executors, administrators, or assigns; for which payment well and truly to be made, we bind our-  
selves, and each of us, our and each of our heirs, executors and administrators, jointly and severally, and  
firmly, by these presents. Sealed with our seals, and dated this 28 day of October in the  
year of our Lord, One Thousand Nine Hundred and Seventy.

The condition of the above obligations is such, that whereas the above bound Woolco Department Store  
on the day of the date hereof, hath obtained at the suit of Woolco Department Store vs. Mrs.  
Joyce Blackwell, a/k/a Mrs. O.E. Pannell  
a Summons and Complaint for the recovery of personal chattels in specie against and asks an  
endorsement by the Clerk of this Court "That the Sheriff is required to take the property mentioned in said  
complaint into his possession," as required by law in such cases, which Summons and Complaint are return-  
able to the next term of the Circuit Court of ~~Montgomery~~ Baldwin for said County and which said endorsement is  
made upon the Plaintiff entering into this Bond.

Now, if the said Plaintiff shall fail in this suit, and shall pay the Defendant all such costs and damages  
as she may sustain by reason of the wrongful complaint in said case, then this obligation to be void,  
otherwise to remain in full force and effect.

\_\_\_\_\_(L. S.)  
Woolco Department Store By  
\_\_\_\_\_(L. S.)  
\_\_\_\_\_(L. S.)

Approved this  
day of 19 70

Clerk.

State of Alabama  
Montgomery County

I, John R. Matthews, Clerk of the Circuit Court of Montgomery County,  
Alabama, hereby certify that this is a good and sufficient bond and if  
presented to me in this County, I would approve the same.

This the 28th day of October, 1970.

John R. Matthews  
Circuit Clerk

THE STATE OF ALABAMA

~~Montgomery~~ County  
Baldwin

Alice J. Duck

Baldwin

Before me, ~~John B. Matthews~~, Clerk of the Circuit Court of ~~Montgomery~~ County, in and for said County,  
personally appeared Woolco Department Store by Barry Rhodes who being duly

sworn, deposeth and saith, That the property sued for

in the complaint of

Woolco Department Store vs. Mrs. Joyce Blackwell, a/k/a Mrs. O.E. Pannell:  
One Whirlpool Dryer, Model No. LTE; Serial No. 990AU

belongs to Woolco Department Store

to-wit:

the said Plaintiff.

Sworn to and subscribed before me this

28 day of October 1970  
John L. Matthews  
Clerk.

Barry Rhodes *credit mg.*  
Woolco Department Store by  
Barry Rhodes

FILED

OCT 30 1970  
Clerk

ALICE J. DUCK

CLERK  
REGISTER

DENTINUE BOND AND  
AFFIDAVIT

Woolco Department Store

vs.

Mrs. Joyce Blackwell  
a/k/a Mrs. O.E. Pannell  
109 Gaston Street  
Fairhope, AL

Circuit Court of ~~Montgomery~~  
Baldwin  
County

Filed in office

day of

19