THOMAS-CORTE PONTIAC, INC.	Į	IN THE CIRCUIT COURT OF
Plaintiff	4	BALDWIN COUNTY, ALABAMA
Vs. CALDONIA GIBBS		AT LAW
		CASE NO. 9650
Defendent	Ĭ	•••••

Comes now the Defendent in the above style cause and files this her answer to each and every count thereof, as follows:

- 1. Not guilty.
- 2. The defendent is not guilty of the matters alleged in said BILL of COMPLAINT.
- 3. The general issue.

Attorney for Defendent

The Defendent respectfully demands a Trial by Jury.

Attorney for Defendent

## CERTIFICATE OF SERVICE

I hereby certify that I have on this 15th day of March, 1971, served a copy of the foregoing on Lloyd E. Taylor, Fairhope, Alabama, by mailing the same by United States Mail, properly addressed, and first-class postage prepaid.

ICHARD C. LACEY, Attorney at Law

FILED

MAR 17 1971

EUNICE B. BLACKMON CIRCUIT

STATE OF ALABAMA	Ø	IN THE CIRCUIT COURT OF
COUNTY OF BALDWIN	<b>X</b>	BALDWIN COUNTY - AT LAW

## TO ANY SHERIFF OF THE STATE OF ALABAMA:

Your are hereby commanded to summon CALDONIA GIBBS, to APPEAR AND ANSWER, PLEAD OR DEMUR, WITHIN THIRTY DAYS FROM THE DATE HEREOF OF THIS SERVICE, TO THE BILL OF COMPLAINT FILED AGAINST HER IN THE CIRCUIT COURT, AT LAW, FOR SAID COUNTY AND SAID STATE BY THOMAS-CORTE PONTIAC, INC.

HEREIN FAIL NOT, DUE RETURN MAKE OF THIS WRIT AS THE LAW DIRECTS.

WITNESS MY HAND THIS 25 DAY OF Jan, 1971.

THOMAS-CORTE PONTIAC, INC.		Ĭ		THE MILLS OF DOLLT M. COLUDE OF
$P_{LAINTIFF}$		Ĭ		IN THE CIRCUIT COURT OF
<b>75.</b>	٠,	Ĭ	,	BALDWIN COUNTY, ALABAMA  AT LAW
CALDONIA GIBBS		Ø		FA I LIFA W
Defendan $ au$	5.	$\delta^{\odot}$	t*	CASE NO: 9/5

## COUNT ONE:

PLAINTIFF CLAIMS OF DEFENDANT THE SUM OF TWO HUNDRED SEVENTEEN AND 17/100 (\$217.17) DOLLARS, DUE BY PROMISSORY NOTE MADE BY HER ON, HERETOFORE, TO-WIT, MAY 3, 1970, WHICH SUM OF MONEY, WITH INTEREST THEREON FROM TO-WIT, MAY 3, 1970, IS DUE AND UNPAID; AND Plaintiff avers that in and by the terms of said note, the Defendant WAIVED ALL RIGHTS OF EXEMPTION UNDER THE LAWS OF THE STATE OF ALABAMA, AND PLAINTIFF CLAIMS THE BENEFIT OF SAID WAIVER; PLAINTIFF CLAIMS THE ADDITIONAL SUM OF FORTY (\$40.00) AND NO/100 DOLLARS, AS ATTOR-NEY FEES FOR BRINGING THIS SUIT FOR THAT THE DEFENDANT IN AND BY

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THE TERMS OF SAID NOTE AGREED TO PAY A REASONABLE ATTORNEY FEE, AND
PLAINTIFF AVERS THAT SAID AMOUNT IS A REASONABLE ATTORNEY FEE FOR
THE BRINGING AND PROSECUTING OF THIS SUIT.

BAILEY & TAYLOR

BY ATPORNET FOR THE PLANTIFF

€AN 251971

Erniel S. Blackman Eller

CASE No: 9650 IN THE CIRCUIT COURT OF BALDWIN COUNTY - AT LAW

THOMAS-CORTE PONTIAC, INC.

 $P_{LAINTIFF}$ 

VS.

CALDONIA GIBBS

Defendant

TO ANY SHERIFF OF THE

STATE OF ALABAMA;

DEFENDANT MAY BE SERVED

AT:

805 Twin Beech Road Fairhope, Alabama 36532

Enice B. Stackman Eleck



