

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

March 8, 1971

• Mrs. Eunice Blackmon, Clerk  
Circuit Court, Baldwin County  
Bay Minette, Alabama 36507


Re: United States Finance Co., Inc.  
Vs. Hales, Case #9673

• Dear Eunice:

Enclosed please find a motion to abate the action  
in the above styled cause and also a demand for trial by  
jury.

With kind regards, I am

Yours very truly,

  
Wilson Hayes

WH/ms  
Enc.

cc: Perloff, Reid & Briskman

PERLOFF, REID & BRISKMAN

ATTORNEYS AT LAW  
257 ST. ANTHONY STREET  
MOBILE, ALABAMA 36603

MAYER W. PERLOFF  
T. DWIGHT REID  
DONALD M. BRISKMAN

March 13, 1972

AREA CODE 205  
TELEPHONE 433-5412

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

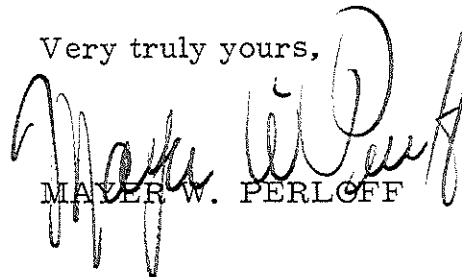
Re: United States Finance Company vs. Hale Case No. 9673

Dear Mrs. Blackmon:

A few weeks ago, I wrote Judge Mashburn and asked him to reinstate the above captioned cause, which was dismissed while I was off in the Legislature. I have not heard from Judge Mashburn in this connection and I would appreciate your advising me as to whether or not he saw fit to reinstate this case on the trial docket.

Thank you for your kind attention.

Very truly yours,



MAYER W. PERLOFF

MWP/wm



UNITED STATES FINANCE  
COMPANY, INC.,  
A Corporation,

Plaintiff,

Vs.

CHARLES E. HALE and DELORIS  
HALE,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 9673

Comes now Defendants in the above styled cause and  
respectfully demands trial by Jury.

*Wilson Hayes*

Attorney for Defendants

Wilson Hayes

P. O. Box 300

Bay Minette, Alabama 36507

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 8<sup>th</sup> day of March,  
1971, 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, with first class postage prepaid.

*Wilson Hayes*

**FILED**

MAR 10 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

UNITED STATES FINANCE  
COMPANY, INC.,  
A Corporation,

Plaintiff,

Vs.

CHARLES E. HALE and DELORIS  
HALE,

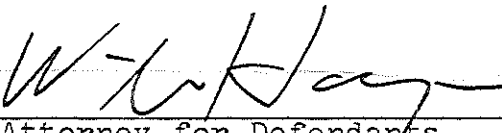
Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

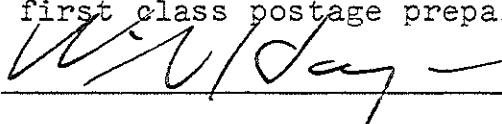
NUMBER: 9673

Comes now Defendants in the above styled cause and moves the Court to abate the said action against them for that there is now pending in the Circuit Court of Baldwin County, Alabama, in Equity, a certain lawsuit styled and entitled Charles E. Hale and Deloris Hale, Complainants Versus Economy Construction Company and United States Finance Company, Inc., a Corporation, et al wherein there is pending the matter of the title and ownership of the property, the subject of this suit, that service has been had on Plaintiff in this cause, United States Finance Company, Inc., a Corporation, and that the same is well known to Plaintiff herein.

  
\_\_\_\_\_  
Attorney for Defendants  
Wilson Hayes  
P. O. Box 300  
Bay Minette, Alabama 36507

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 8<sup>th</sup> day of March, 1971, 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, with first class postage prepaid.

  
\_\_\_\_\_

**FILED**

MAR 10 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

UNITED STATES FINANCE  
COMPANY, INC., a corpor-  
ation,

Plaintiff,

vs.

CHARLES E. HALE and  
DELORIS HALE,

Defendants.

( IN THE CIRCUIT COURT OF

( BALDWIN COUNTY, ALABAMA,

( AT LAW

( CASE NO. 9673

The plaintiff sues to recover possession of the following tract of  
land:

Begin at the Southwest corner of Francis Steele Grant,  
Section 43, Township 1 North, Range 2 East, being the  
corner of the first angle from the Lake of the  
Francis Steele Grant; thence run Northwardly along  
the Grant line 500.91 feet, for the point of beginning;  
thence continue North along Grant line 220 feet to a  
corner, being the Southwest corner of lot owned by  
Gus Pitts, acquired of Mrs. M. A. Robinson; thence run  
East 894.3 feet to a stake; thence run South 220 feet  
to a corner; thence run West to a point or place of beginning  
on the Grant line, Section 43, Township 1 North, Range 2  
East, Baldwin County, Alabama.

of which it has the legal title thereto, and upon which, pending such  
possession, and before the commencement of this suit, the defendant  
entered and unlawfully withholds, together with ONE HUNDRED DOLLARS  
(\$100.00) for the detention thereof.

PERLOFF, REID & BRISKMAN

BY: W. A. Reid  
Attorneys for Plaintiff

Defendants may be served:

General Delivery, Stockton, Alabama, OR Star Route Box 332, Stockton, Ala.  
OR the directions for service are as follows:  
From Stockton turn left in front of Hoster's Grocery. Go to first stop  
sign, turn left taking first left turn after passing school house, property  
is sitting out in field on left side.

FILED

FEB 8 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

SUMMONS AND COMPLAINT

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

Circuit Court, Baldwin County

No. 9673

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Charles E. Hale & Deloris Hale

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint  
filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette against.....

Charles E. Hale & Deloris Hale *Hales* Defendant.....

by United States Finance Company, Inc., a corporation.....

....., Plaintiff.....

Witness my hand this 8th day of February 19 71

*Emmie B. Blackmon* Clerk

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

UNITED STATES FINANCE COMPANY,

INC., A CORPORATION

Plaintiffs

vs.

CHARLES E. HALE & DELORIS HALE

Defendants

**SUMMONS AND COMPLAINT**

Filed .....2/8/71..... 19.....

Eunice B. Blackmon Clerk

Perloff, Redd & Briskman  
 257 St. Anthony St. Plaintiff's Attorney  
 Mobile, Ala. 36603

Defendant's Attorney

Defendant lives at

Received In Office

Feb. 9 1971

Taylor Wilkins Sheriff

I have executed this summons

this 15 Feb 1971

by leaving a copy with

T

Charles E. Hale

Deloris Hale

22 122  
 Sheriff claims 44 miles at

Ten Cents per mile Total \$ 4.40

TAYLOR WILKINS, Sheriff

BY Robert  
 DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. A. Salient Deputy Sheriff



*Law Offices of*  
**PERLOFF, REID & BRISKMAN**  
257 ST. ANTHONY STREET  
MOBILE, ALABAMA 36603

MAYER W. PERLOFF  
T. DWIGHT REID  
DONALD M. BRISKMAN

January 28, 1971

AREA CODE 205  
TELEPHONE 432-5412

Mrs. Eunice B. Blackmon  
Clerk, Circuit Court of Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama

9673

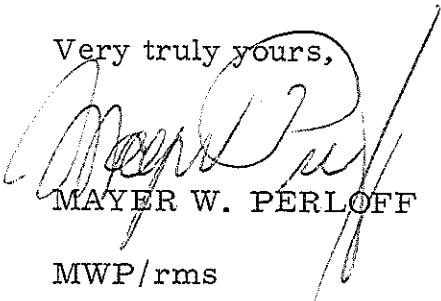
Re: United States Finance Co., Inc. vs. HALE, Charles and Deloris

Dear Mrs. Blackmon:

Please file the attached ejectment action in your court and advise me when you have obtained service.

Thank you for your cooperation.

Very truly yours,

  
MAYER W. PERLOFF

MWP/rms

Enc/