

Shirley Hall

1. Bishop, Ethel, Merchant, 456 S. Section St., Fairhope, Ala. P1
2. Clay, Ray, Ast. Cstdn. VAW, 504 Equality St., Fairhope, Fairhope, Ala. vs
3. Coleman, Carolyn F., Housewife, 1801 Auburn Av., Bay Minette, Ala. E.B. Swin, Jr.
4. Crosby, Wm., N., Crosby Lbr. Co., 608 Mixon Av., Bay Minette, Ala. P6
5. Davidson, Audrey N., Clk, West Bros., 310 Mango St., Bay Minette, Ala.
6. Dorch, Alexander, Fisherman, 701 Dan Horne Lane, Fairhope, Ala.
7. Graves, Susie, Housewife, 914 S. Dobson, Bay Minette, Ala.
8. Higgins, Robert, Salesman, 40 S. Section St., Fairhope, Ala.
9. Hollingsworth, George H., Bob White Chev., 503 1st St., Bay Minette, Ala.
10. Lee, Richard E., Merc. Stockton, Stockton, Ala. P8
11. Leon, Willie, Musician Grand Hotel, 253 S. Section Fairhope, Ala. Point Clear D5
12. Lewis, Dollie S., Housewife, 1105 Marks Av., Bay Minette, Ala.
13. Long, Lee, Merc., Rabon St., Bay Minette, Ala. D3
14. McGurie, Edith S., Housewife, Tensaw, Alabama
15. McKenzie, Gene E., Purch Agt. Pinto Island Mtls. 113 Orange St., Fairhope, Ala.
16. McMillan, Raymond, Farmer, Stockton, Stockton, Alabama
17. Parker, Gertrude M., Bkpr. Bald, Co. Sav. & Loan, 8 North School St., Fairhope P4
18. Passmore, Lousie S., School Sec. P. O. Box 247, Silverhill, Ala.
19. Phillips, Maetha L., Vanity Fair Star Rt. Stockton Atmore, Ala.
20. Pipkin, James L., PNAS Stockton, Ala. Pensacola, Fla.
21. Powell, John O., Kaiser Almn. 110 S. Day St., Bay Minette, Ala.
22. Robinson, Marlene B., Housewife, 155 Orange St., Fairhope
23. Rost, Charles H., Mech. NASS 22 Fig St., Fairhope, Ala. Pensacola, Fla. D6
24. Smith, Sidney K., Retired Lee St., Bay Minette, Ala. D4
25. Stephens, Robert T., Acct. Chevron Asphalt, 374 Ridgewood Cir. Fairhope, Ala. P5
26. Vick, Lloyd, Janitor F Hope High School, 306 Delmar, Fairhope, Ala. P3
27. Washington, John Ed., Retired, Blacksher Rt., Bay Minette, Ala.
28. Watts, McFarlan, Logger, 101 Banyan St., Bay Minette, Ala.
29. York, Annie W., Maid BCHS Tensaw, Ala. Bay Minette, Ala.
30. White, Elaine, Beauty Shop, Perdido D1
31. Brown, Hilary, Bay Minette
32. Dean, Mary, Housewife, Bay Minette D7
33. Eddins, Laura Lee, Clerk, Bay Minette D8P?
34. Weekley, Eleanor, Housewife, Perdido
35. Demko, Glenda, Housewife, Bay Minette
36. Bryars, Dollie Mae, Clerk, Bay Minette P2
37. Gabel, Dennis, Telephone SCB, Winterhaven Ct., Fairhope
38. Chastang, J. D., Paper Mill, Cross Roads Rt., Mobile
39. Rider, Hannis Monsanto, 207 Townsend Ave., Bay Minette, Pensacola
40. Irvin, Edward D., Mach. Opr. Kaiser Almn. 603 E. 7th St., Bay Minette D2
41. McDade, Adelaide D., Ala. State Emp. Serv. 523 Stimpson Ave., Fairhope P9

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WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

March 29, 1971

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

Re: Hall Vs. Gwin, et al.
Case #9698

Dear Eunice:

Please file the enclosed amended complaint in
the above noted case.

With kind regards, I am

Yours very truly,


Wilson Hayes

WH/ms
Enc.

cc w/enc: Mr. Norborne C. Stone

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

February 16, 1971

Clerk, Circuit Court
Baldwin County
Bay Minette, Alabama 36507

9698

Dear Eunice:

Enclosed is the Court's record of Criminal Case
Number 5375, Shirley Ann Hall. Also enclosed is a suit
styled Shirley Ann Hall Vs. E. B. Gwin, et al.

Please file the suit and have it served on
Defendants.

With kind regards, I am

Yours very truly,


Wilson Hayes

WH/ms
Enc.

SHIRLEY ANN HALL, who sues by
her next friend, Rita Hall,

Plaintiff,

vs.

E. B. GWIN, JR., BEDSOLE'S
OF FAIRHOPE a/k/a BEDSOLE'S
DEPARTMENT STORE, a/k/a
BEDSOLE'S DRY GOODS COMPANY,
INC. a corporation, JOHN DOE
and RICHARD ROE, whose names
are otherwise unknown to
Plaintiff,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 9698

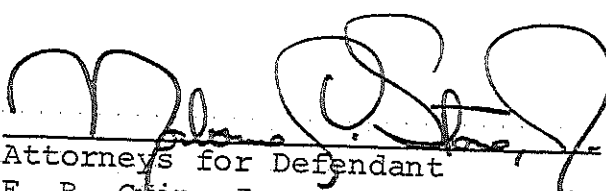
DEMURRER

Comes now the Defendant, E. B. Gwin, Jr., by his
attorneys, and demurs to the Complaint heretofore filed against
him and to each count thereof, separately and severally, and
assigns the following separate and several grounds in support
thereof:

1. The Complaint fails to state a cause of action.
2. The Complaint fails to allege that Shirley Ann Hall
is a minor.
3. The Complaint fails to allege any facts conferring
upon Rita Hall any right to sue for Shirley Ann Hall.

Respectfully submitted,

CHASON, STONE & CHASON

By: 
Attorneys for Defendant
E. B. Gwin, Jr.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing
pleading has been served upon counsel
for all parties to this proceeding, by
mailing the same to each by First Class
United States Mail, properly addressed
and postage prepaid on this 5 day

of March, 1971

FILED

MAR 5 1971

EUNICE B. BLACKMON
CIRCUIT
CLERK

SHIRLEY ANN HALL, who sues by
her next friend, Rita Hall,

Plaintiff,

vs.

E. B. GWIN, JR. , BEDSOLE'S
OF FAIRHOPE a/k/a BEDSOLE'S
DEPARTMENT STORE, a/k/a
BEDSOLE'S DRY GOODS COMPANY,
INC. , a corporation, JOHN DOE
and RICHARD ROE, whose names
are otherwise unknown to
Plaintiff,

Defendants.

* * * * *

DEMURRER

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CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

SHIRLEY ANN HALL, who sues by
her next friend, Rita Hall,

Plaintiff,

vs.

E. B. GWIN, JR. , BEDSOLE'S
OF FAIRHOPE a/k/a BEDSOLE'S
DEPARTMENT STORE, a/k/a
BEDSOLE'S DRY GOODS COMPANY,
INC. , a corporation, JOHN DOE
and RICHARD ROE, whose names
are otherwise unknown to
Plaintiff,

Defendants.

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DEMURRER

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CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

SHIRLEY ANN HALL,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

X

BALDWIN COUNTY, ALABAMA

E. B. GWIN, JR., BEDSOLE
TRADING CO., INC., d/b/a
BEDSOLE'S OF FAIRHOPE,
d/b/a BEDSOLE'S DEPARTMENT
STORE,

X

X

AT LAW

NO. 9698

X

Defendants.

X

Come now the Defendants in the above styled cause and
for answer to the Complaint heretofore filed against them, say
as follows:

1. Not guilty.

CHASON, STONE & CHASON

By:

Malone Stone
Attorneys for Defendants

Filed
4-12-72

Ernie B. Blackmon

Circuit Clerk

We, the jury, find in favor of the Plaintiff
damages in the amount \$1800.00.
We the jury find for the P. and against the
Defendants and assess her damages at \$1800.00.

J. J. [Signature]

SHIRLEY ANN HALL, who sues by
her next friend, Rita Hall,

Plaintiff,

vs.

E. B. GWIN, JR., BEDSOLE'S
OF FAIRHOPE a/k/a BEDSOLE'S
DEPARTMENT STORE, a/k/a
BEDSOLE'S DRY GOODS COMPANY,
INC., a corporation, JOHN DOE
and RICHARD ROE, whose names
are otherwise unknown to
Plaintiff,

Defendants.

X

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IN THE CIRCUIT COURT OF

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BALDWIN COUNTY, ALABAMA

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AT LAW

NO. 9698

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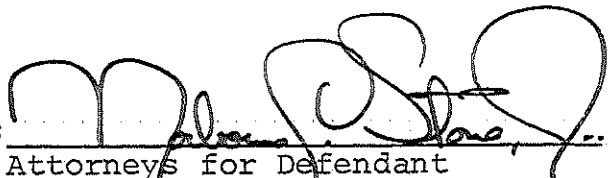
PLEA

Comes now Bedsole Dry Goods Company, Inc., a corporation,
by its attorneys, and appearing specially for the purpose of
filing this plea and for no other different object or purpose
and pleads to the Complaint heretofore filed against Bedsole's of
Fairhope a/k/a Bedsole's Department Store, a/k/a Bedsole's
Dry Goods Company, Inc., a corporation, as follows:

1. Nul tiel corporation.

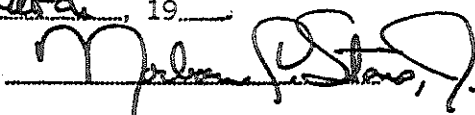
Respectfully submitted,

CHASON, STONE & CHASON

By: 
Attorneys for Defendant
Bedsole Dry Goods Company, Inc.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing
pleading has been served upon counsel
for all parties to this proceeding, by
mailing the same to each by First Class
United States Mail, properly addressed
and postage prepaid on this 5 day
of March, 1971



FILED

MAR 5 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

THE UNIVERSITY OF CHICAGO

PHYSICS DEPARTMENT

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PHYSICS DEPARTMENT

CHICAGO

9698

SHIRLEY ANN HALL, who sues by
her next friend, Rita Hall,

Plaintiff,

vs.

E. B. GWIN, JR., BEDSOLE'S
OF FAIRHOPE a/k/a BEDSOLE'S
DEPARTMENT STORE, a/k/a
BEDSOLE'S DRY GOODS COMPANY,
INC., a corporation, JOHN DOE
and RICHARD ROE, whose names
are otherwise unknown to
Plaintiff,

Defendants.

* * * * *

PLEA

* * * * *

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon E. B. Gwin, Jr.,
Bedsole's of Fairhope a/k/a Bedsole's Department Store, a/k/a
Bedsole's Dry Goods Company, Inc., a Corporation, John Doe and
Richard Roe, whose names are otherwise unknown to Plaintiff 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 Shirley Ann
Hall who sues by her next friend, Rita Hall.

Witness my hand this 17 day of February, 1971.

All Defendants may be served:

Bedsoles of Fairhope
Fairhope, Alabama

Ernie S. Blackmon
Clerk

SHIRLEY ANN HALL who sues by ☐ IN THE CIRCUIT COURT OF
her next friend, Rita Hall,

Plaintiff, ☐ BALDWIN COUNTY, ALABAMA

Vs. ☐ AT LAW

E. B. GWIN, JR., BEDSOLE'S ☐
OF FAIRHOPE a/k/a BEDSOLE'S ☐
DEPARTMENT STORE, a/k/a ☐
BEDSOLE'S DRY GOODS COMPANY, ☐
INC., a Corporation, JOHN DOE ☐
and RICHARD ROE, whose names ☐
are otherwise unknown to ☐
Plaintiff,

NUMBER: 9698

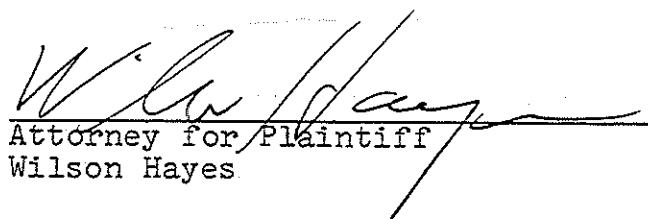
Defendants. ☐

I

The Plaintiff claims of the Defendants Twenty-five
Thousand Dollars (\$25,000), for maliciously, and without probable
cause therefor, causing the Plaintiff to be arrested under a
warrant issued by Arrie S. Godwin, a Justice of the Peace on the
18th day of June, 1970, on a charge of "issuing worthless checks",
also called "false pretense", which charge, before the commence-
ment of this action, has been judicially investigated, and said
prosecution ended, and the Plaintiff discharged.

II

The Plaintiff claims of the Defendants Twenty-Five Thousand Dollars (\$25,000) damages for unlawfully causing the Plaintiff to be arrested and imprisoned, on a charge of "issuing worthless checks" also called "false pretenses" for one day, viz on the 27th day of June, 1970.


Attorney for Plaintiff
Wilson Hayes

Plaintiff demands trial by Jury
this 17th day of February, 1971.


FILED

FEB 17 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

NUMBER: 9698

Shirley Ann Hall who sues by
her next friend, Rita Hall,

Plaintiff,

Vs.

E. B. Gwin, Jr., Bedsole's
of Fairhope a/k/a Bedsole's
Department Store, a/k/a
Bedsole's Dry Goods Company,
Inc., a Corporation, John Doe
and Richard Roe, whose names
are otherwise unknown to
Plaintiff,

Defendants.

In the Circuit Court of
Baldwin County, Alabama
At Law

All Defendants may be served:

Bedsoles of Fairhope
Fairhope, Alabama

FILED

FEB 17 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

VOL 68 PAGE 406

by W.C. Roark
DEPUTY SHERIFF
Ten Cents Per mile Total \$ 14.00
TAYLOR WILKINS, Sheriff
Miles at 14.00

Received 17 day of Feb. 1971
and at 20 day of Feb. 1971
I served a copy of the within StC
on E. B. Gwin, Jr.
Bedsoles of Fairhope
John Doe,
Richard Roe

By service on E. B. Gwin & Bedsoles - John Doe & Richard
TAYLOR WILKINS, Sheriff
By W.C. Roark
D.S.


SHIRLEY ANN HALL, X IN THE CIRCUIT COURT OF
Plaintiff, X BALDWIN COUNTY, ALABAMA
Vs. X AT LAW
E. B. GWIN, JR., BEDSOLE X
TRADING CO. INC. d/b/a X
BEDSOLE'S OF FAIRHOPE d/b/a X NUMBER: 9698
BEDSOLE'S DEPARTMENT STORE, X
Defendants. X

Comes now Plaintiff in the above styled cause and files this, her motion, and says:

1. That heretofore in this cause Plaintiff filed interrogatories to be answered under oath by E. B. Gwin, Jr., which interrogatories were served on or accepted by Defendants' Counsel on to-wit December 11, 1971.
2. That more than sixty days have elapsed since such service.
3. That the cause is set for trial on the 12th day of April, 1972.
4. That the interrogatories are necessary for the prosecution of Plaintiff's cause.

WHEREFORE Plaintiff does move the Court, as made and provided by Title 7, Section 486, Alabama 1940 as amended, recompiled 1958, to make and enter an order requiring Defendant, E. B. Gwin, Jr., to answer the said interrogatories within five days or suffer Judgment by Default and such other penalty as the Court may assess.

Respectfully moved.


Wilson Hayes
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 3rd day of April, 1972, 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

APR 4 1972

SHIRLEY ANN HALL, X IN THE CIRCUIT COURT OF
Plaintiff, X BALDWIN COUNTY, ALABAMA
Vs. X AT LAW
E. B. GWIN, JR., BEDSOLE X
TRADING CO. INC. d/b/a X
BEDSOLE'S OF FAIRHOPE d/b/a X NUMBER: 9698
BEDSOLE'S DEPARTMENT STORE,
Defendants. X

This day came Plaintiff by her Attorney and moved the Court to require Defendant, E. B. Gwin, Jr., to answer interrogatories heretofore propounded to him or suffer judgment against him or other penalty as may be assessed, it is therefore

ORDERED that Defendant, E. B. Gwin, Jr., answer interrogatories heretofore propounded to him by the 12th day of April, 1972 or suffer Judgment by Default.

Done this 4th day of April, 1972.

Telfair J. Mashburn
Telfair J. Mashburn, Judge
Circuit Court, In Equity
Baldwin County, Alabama

FILED

APR 4 1972

EUNICE B. BLACKMON CIRCUIT CLERK

SHIRLEY ANN HALL, a minor,
who sues by her mother and
next friend, Rita Hall,

Plaintiff,

Vs.

E. B. GWIN, JR., BEDSOLE
TRADING CO. INC. d/b/a
BEDSOLE'S OF FAIRHOPE d/b/a
BEDSOLE'S DEPARTMENT STORE,

Defendants.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 9698

Comes now Plaintiff and amends her complaint to read
as follows:

SHIRLEY ANN HALL,

Plaintiff,

Vs.

E. B. GWIN, JR., BEDSOLE
TRADING CO. INC. d/b/a
BEDSOLE'S OF FAIRHOPE d/b/a
BEDSOLE'S DEPARTMENT STORE,

Defendants.

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I

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 9698

The Plaintiff claims of the Defendants Twenty-five
Thousand Dollars (\$25,000), for maliciously, and without probable
cause therefor, causing the Plaintiff to be arrested under a
warrant issued by Arrie S. Godwin, a Justice of the Peace on the
18th day of June, 1970, on a charge of "issuing worthless checks",
also called "false pretense", which charge, before the commencement
of this action, has been judicially investigated, and said
prosecution ended, and the Plaintiff discharged.

Wilson Hayes
Attorney for Plaintiff
Wilson Hayes

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 15th day of Oct,
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

OCT 15 1971

EDWARD B. BLACKBURN
CIRCUIT
CLERK

VOL

68 PAGE 410

SHIRLEY ANN HALL, who sues by
her next friend, Rita Hall,

Plaintiff,

Vs.

E. B. GWIN, JR., et al,

Defendants.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 9698

Comes now Plaintiff and amends her complaint to read
as follows:

SHIRLEY ANN HALL, a minor,
who sues by her mother and
next friend, Rita Hall,

Plaintiff,

Vs.

E. B. GWIN, JR., BEDSOLE
TRADING CO. INC. d/b/a
BEDSOLE'S OF FAIRHOPE d/b/a
BEDSOLE'S DEPARTMENT STORE,

Defendants.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

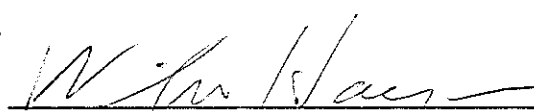
NUMBER: 9698

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also called "false pretense", which charge, before the commence-
ment of this action, has been judicially investigated, and said
prosecution ended, and the Plaintiff discharged.

II

The Plaintiff claims of the Defendants Twenty-Five
Thousand Dollars (\$25,000) damages for unlawfully causing the
Plaintiff to be arrested and imprisoned, on a charge of "issuing
worthless checks" also called "false pretenses" for one day, viz
on the 27th day of June, 1970.


Attorney for Plaintiff
Wilson Hayes

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 29th 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.

