

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

September 28, 1972

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

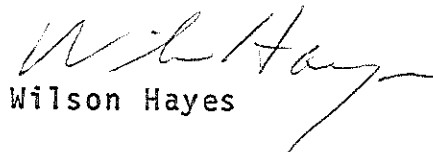
Re: General Electric Credit Corporation
vs. Willis Anderson - Case #9699

Dear Mrs. Blackmon:

Please submit this case to Judge Mashburn for
judgment by consent for \$400. I was under the impression
that this had already been done.

With kind regards, I am

Yours very truly,


Wilson Hayes

WH/mm

cc: Mr. Donald Briskman

COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS
COURTROOM "B" FIRST FLOORThe State of Alabama,
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon.....WILLIS ANDERSON.....

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile County, on the 11 day of Feb, 1971 at the hour of 9:00 A.M., then and there to answer a complaint of GENERAL ELECTRIC CREDIT CORPORATION a corporation

of a debt or other demand not exceeding Seven Hundred Fifty Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this.....day of....., 19.....

H. D. Richardson
Clerk of the Court of General Sessions of Mobile County.

Cause of Action

Plaintiff claims of Defendant \$ 636.66
due by promissory note contract made by

COURT OF GENERAL
SESSIONS

him on to-wit: 3/18/67
Defendant failed to pay said note contract according to its terms. By said note contract defendant waived all right of exemption and agreed to pay a reasonable attorney's fee, which is claimed in the amount of \$ 11534.

DEC 25 11 28 AM '70

T. Dwight Reel
Attorneys for Plaintiff

COMPLAINT AND SUMMONS

Atty. for Plaintiff: PERLOFF, REID, & BRISKMAN

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS
OF MOBILE COUNTY

No. 93162
Ret. Feb. 11, 1971
GENERAL ELECTRIC CREDIT CORPORATION

VS.

WILLIS ANDERSON

Continued To

Box 103 Stockton, Alabama
emp: Bacon McMillian, Stockton, Ala.

Executed by Service on

Defendant

This day, 19.....

Sheriff of Mobile County

By
Deputy Sheriff

COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS
COURTROOM "B" FIRST FLOORThe State of Alabama,
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon WILLIS ANDERSON

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile County, on the 11 day of Jan, 1971 at the hour of 9:00 A.M., then and there to answer a complaint of GENERAL ELECTRIC CREDIT CORPORATION a corporation

of a debt or other demand not exceeding Seven Hundred Fifty Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this.....day of....., 19.....

Ad. Beckman
Clerk of the Court of General Sessions of Mobile County.

Cause of Action

~~Plaintiff's claim or Defendant's~~ 636.66
~~due by promissory note~~

sum on to-wit: 3/18/67

Defendant failed to pay said sum according to its terms. Defendant waived all right of exception and agreed to pay a reasonable attorney's fee, which is claimed in the amount of \$ 113.34

T. D. Wright, Jr.
Attorneys for Plaintiff

COMPLAINT AND SUMMONS

Atty. for Plaintiff: PERLOFF, REID, & BRISKMAN

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS
OF MOBILE COUNTY

No. 93162

Ret.

Feb 11/1971
GENERAL ELECTRIC CREDIT CORPORATION

VS.

Bald. Co.

WILLIS ANDERSON

Continued To

A
Box 103 Stockton, Alabama
emp: Bacon McMillian, Stockton, Ala.

RECEIVED

JAN 6, 1971

TAYLOR WILKINS
SHERIFF

Executed by Service on

Willis Anderson

Defendant

This 13 day Jan, 1971

Sheriff of Mobile County

By

W A Tolbert

Deputy Sheriff

REC'D SHERIFF DEPT.
MOBILE COUNTY, ALA.

DEC 30 2 30 PM '70

BY

Sheriff claims 0 miles at

Ten Cents per mile Total \$

TAYLOR WILKINS, Sheriff

BY

Tolbert
DEPUTY SHERIFF

931621

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

January 18, 1971

Clerk, General Sessions
Mobile County Court House
Mobile, Alabama 36602

Re: General Electric Credit Corporation,
Vs. Willis Anderson, Case #93162

Dear Sir:

Please file the enclosed Plea in Abatement in the
above styled case.

With kind regards, I am

Yours very truly,

W. H. Hayes
Wilson Hayes

WH/ms
Enc.

cc: T. Dwight Reid

GENERAL ELECTRIC CREDIT
CORPORATION, a Corporation,

Plaintiff,

Vs.

WILLIS ANDERSON,

Defendant.

Ø

IN GENERAL SESSIONS COURT OF

Ø

MOBILE COUNTY, ALABAMA

Ø

Ø

NUMBER: 93162

Ø


PLEA IN ABATEMENT

Comes now the Defendant in the above styled cause by his Attorney, Wilson Hayes, and makes his appearance in this cause specially and only for the purpose of making the following plea:

1. Plaintiff ought not to have and maintain the above styled cause for that Defendant is now and was at the time of the filing of this cause, a resident citizen of Baldwin County, Alabama.

2. Plaintiff ought not to have and maintain his suit in this cause for that Defendant is not now and never has been a resident of Mobile County, Alabama.

3. Plaintiff ought not to have and maintain his suit in the above styled cause for that Defendant resides in and has always resided in Stockton, Baldwin County, Alabama and that Plaintiff well knows this fact, that the said address given for service is Defendant's address in Baldwin County, Alabama.



Wilson Hayes, Attorney for Defendant

STATE OF ALABAMA
BALDWIN COUNTY

Before me, Mary C. Stiers, personally appeared Wilson Hayes, who is known to me and who being by me first duly sworn to speak the truth, deposes and says he has read the foregoing Plea in Abatement and knows the facts therein stated are true.


Wilson Hayes

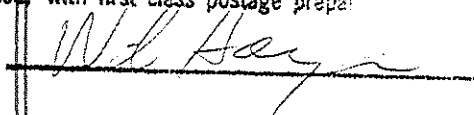
Sworn to and subscribed before me this the 18th day of January, 1971.


Mary C. Stiers, Notary Public
Baldwin County, Alabama

My Commission Expires January 9, 1974

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 18th day of Jan 1971, served a copy of the foregoing plea in counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, with first class postage prepaid.



THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

Case No. 93162

GENERAL ELECTRIC CREDIT CORPORATION,
A CORPORATION

Plaintiff,

VS

WILLIS ANDERSON

Defendant.

Amount of Claim: \$750.00

(Filed: December 29, 1970
(Summons Issued: December 30, 1970
(Returnable: February 11, 1971
(Service Had: January 13, 1971
(Cause of Action: Promissory Note
(Attorney for Plaintiff: Perloff & Reid
(Attorney for Defendant: Wilson Hayes
(
(
(

January 19, 1971 - Plea in Abatement filed

February 11, 1971 - Plea Confessed

February 11, 1971 - Transfer to Circuit Court of Baldwin County

Perloff & Reid

I hereby certify that the foregoing is a true and correct copy of the above styled cause, as it appears on record and in the files of the Court of General Sessions of Mobile County, Alabama.

Witness my hand this the 16 day of February, 1971.

J. D. Richardson

Clerk of The Court of General
Sessions of Mobile County,
Alabama.

16-9-51-6-70

COST BILL

PERLOFF & REID
ATTORNEYS FOR PLTF:—

General Sessions (Civil Div.) Court of Mobile, Mobile County Court House, Mobile, Ala.

GENERAL ELECTRIC CREDIT CORPORATION, A CORPORATION

Plaintiff

WILLIS ANDERSON

Defendant

CASE NO. 93162

Garnishee

COURT FEES

Summons and proceedings thereon to judgment

\$1.00

Docketing each cause

.10

Law Library Fee

1.00

Garnishment

TOTAL \$

SHERIFF'S FEES

Levying Attachment

6.00

Entering and returning same

.25

Summoning Garnishee and making return

1.50

Serving Summons and other mesne process, and returning the same

1.50

Collecting execution for costs only

1.50

Serving any summons not herein provided for, and making return

1.50

TOTAL \$

GRAND TOTAL

\$

6.35

I respectfully call your attention to the above Court Cost Bill which if not paid by
19_____, it will be my unpleasant duty to issue execution on your property for the recovery of the same.

J. D. Richardson, Clerk

TRANSFER

NOTICE of ~~APPEAL~~

STATE OF ALABAMA,)
MOBILE COUNTY)

~~GENERAL ELECTRIC CREDIT CORPORATION, A CORP.~~

Plaintiff

VS.

WILLIS ANDERSON

Defendant

To WILLIS ANDERSON

in said Cause:

You are hereby notified that ~~GENERAL ELECTRIC CREDIT CORPORATION, A CORP.~~

the ~~PLAINTIFF~~ in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, ~~an appeal from the judgement therein rendered by~~ from the ~~Judge of the~~ COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having complied with the requirements of the law in such cases made and provided, the same has been granted to the next term of the CIRCUIT COURT of ~~Mobile~~ Baldwin County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 16 day of February 1971

Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 93162

GENERAL ELECTRIC CREDIT CORPORATION,
A CORPORATION

Plaintiff,

VS

WILLIS ANDERSON

Defendant.

NOTICE OF APPEAL Transfer

Returnable To The Circuit Court of
Baldwin County

Issued: February 16, 1971

Serve On: Willis Anderson
Box 103
Stockton, Ala.

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

March 27, 1971

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

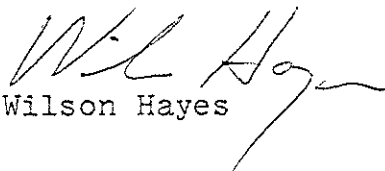
Re: General Electric Credit Corp.
Vs. Willis Anderson

Dear Eunice:

Please file the enclosed motion to quash service
in the above noted case.

With kind regards, I am

Yours very truly,


Wilson Hayes

WH/ms
Enc.

GENERAL ELECTRIC CREDIT
CORPORATION, a Corporation,

Plaintiff,

Vs.

WILLIS ANDERSON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

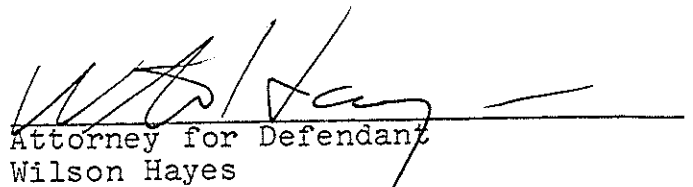
NUMBER: 9699

Comes now Defendant in the above styled cause and appears specially and only for the purpose of filing the within contained motion and moves the Court to quash the service in this cause and assigns as grounds the following:

1. It affirmatively appears that valid service was not had on Defendant.

2. It affirmatively appears from the record that there has been no valid service made on Defendant.

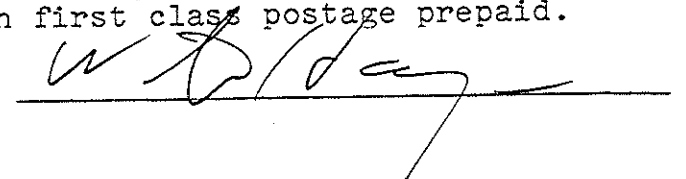
Respectfully moved.



Attorney for Defendant
Wilson Hayes
P. O. Box 300
Bay Minette, Alabama 36507

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.



FILED

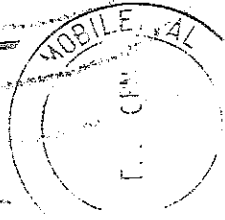
MAR 29 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

THE COURT OF GENERAL SESSIONS

MOBILE COUNTY COURT HOUSE

MOBILE, ALABAMA 36602



Mrs. Alice J. Duck, Circuit Clerk
Baldwin County Court House
Bay Minette, Alabama

9699

The enclosed papers numbered from 1 to 6, include all the original
papers in the case of GENERAL ELECTRIC CREDIT CORP. VS WILLIS ANDERSON
Case No. 93162

Clerk of The Court of General Sessions of Mobile County, Ala.

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

March 27, 1971

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


Re: General Electric Credit Corp.
Vs. Willis Anderson

• Dear Eunice:

Please file the enclosed Jury demand in the
above noted case.

With kind regards, I am

Yours very truly,


Wilson Hayes

WH/ms
Enc.

GENERAL ELECTRIC CREDIT
CORPORATION, a Corporation,

Plaintiff,

Vs.

WILLIS ANDERSON,

Defendant.

§

IN THE CIRCUIT COURT OF

§

BALDWIN COUNTY, ALABAMA

§

AT LAW

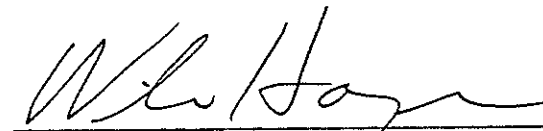
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§

NUMBER:

9699

Comes now Defendant in the above styled cause and
demands trial by jury.



Attorney for Defendant

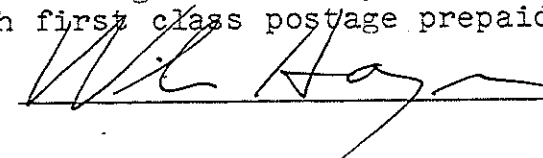
Wilson Hayes

P. O. Box 300

Bay Minette, Alabama

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 27th 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 29 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

GENERAL ELECTRIC CREDIT
CORPORATION, a corporation,

Plaintiff,

vs.

WILLIS ANDERSON,

Defendant.

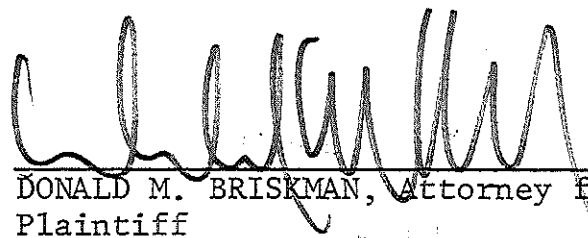
(IN THE CIRCUIT COURT OF
(BALDWIN COUNTY, ALABAMA,
(AT LAW

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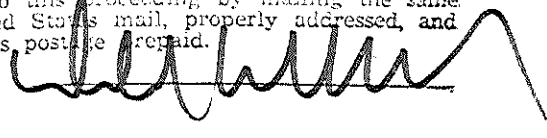
CASE NO. 9699

Comes now the plaintiff in the above styled cause and
moves this Honorable Court to strike the demand for trial by
jury in that said demand was not timely made.


DONALD M. BRISKMAN, Attorney for
Plaintiff

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 15
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, and
first class postage prepaid.



FILED

OCT 15 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

TRANSFER
NOTICE of APPEAL

STATE OF ALABAMA, }
MOBILE COUNTY }

GENERAL ELECTRIC CREDIT CORPORATION, A CORP.

Plaintiff

VS.

WILLIS ANDERSON

Defendant

To WILLIS ANDERSON

in said Cause:

You are hereby notified that GENERAL ELECTRIC CREDIT CORPORATION, A CORP.

the PLAINTIFF in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, ~~an appeal from the judgement therein rendered by~~ from the ~~Judge of the~~ COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having complied with the requirements of the law in such cases made and provided, the same has been granted to the next term of the CIRCUIT COURT of ~~Mobile~~ Baldwin County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 16 day of February 1971

[Signature]
Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 93162

9699

GENERAL ELECTRIC CREDIT CORPORATION,
A CORPORATION

Plaintiff,

VS

WILLIS ANDERSON

Defendant.

NOTICE OF ~~APPEAL~~ Transfer

Returnable To The Circuit Court of
Baldwin County

Issued: February 16, 1971

Serve On: Willis Anderson
Box 103
Stackton, Ala.

Received 22 day of April 19 71
and on 16 day of March 19 71
I received a copy of the within Notice of Transfer
by Willis Anderson

By _____ on _____

TAYLOR, WILKINS, Sheriff
By W. C. Taylor D.S.

MOBILE SHERIFF DEPT.
MOBILE COUNTY, ALA.

MAR 16 3 10 AM '71 FEB 17 9 28 AM '71

BY _____

Sheriff claims _____ miles at

Ten Cents per mile Total \$ _____
TAYLOR WILKINS, Sheriff

BY _____ DEPUTY SHERIFF