

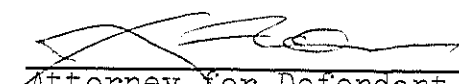
BELLAS HESS SUPERSTORE, INC., )  
OF MOBILE, )  
Plaintiff, )  
VS. )  
MRS. EUGENE P. WILLETT, ET AL, )  
Defendant. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW 9826

PLEA

Now comes the defendant, Mrs. Eugene P. Willett, and  
for answer to the complaint heretofore filed in said cause and  
to each count thereof separately and severally says, separately  
and severally:

1. The allegations of said count are untrue.

  
Attorney for Defendant

**FILED**

MAY 24 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

## GARNISHMENT AFFIDAVIT

THE STATE OF ALABAMA,  
MOBILE COUNTY.

Notary Public

Before me, the undersigned, ~~Clerk of the Court of General Sessions~~ of Mobile County,  
personally appeared Herbert P. Feibelman, Jr. who made oath in  
due form of law that Bellas Hess Superstore, Inc. of Mobile, a corporation hath  
obtained judgment against Mrs. Eugene P. Willett, a/k/a Helen Willett, c/o Elizabeth's  
House of Gifts, Daphne, Alabama  
for Four Hundred Seven and 93/100 (\$407.93) ----- Dollars  
besides cost of suit before The Court of General Sessions of Mobile County, and that Elizabeth's  
House of Gifts, Daphne, Alabama  
is supposed to be indebted  
to or have effects of the said Mrs. Eugene P. Willett, a/k/a Helen Willett  
in its possession, or under its control, and that he believe process of  
Garnishment is necessary against the said Elizabeth's House of Gifts

COURT OF GENERAL  
SESSION

to obtain satisfaction of said judgment.

Subscribed and sworn to before me, the  
3rd day of December 1967

Luc R. Riley  
~~Clerk of the Court of General Sessions of Mobile County~~  
Notary Public, Mobile County, Ala.

Herbert P. Feibelman, Jr.

Feibelman & Silver  
**ATTORNEY FOR PLAINTIFF**

No. 91,008

RET. Jan 26 1971

Bellas Hess Superstore, Inc. of Mobile,  
a corporation Plaintiff

VS. } GARNISHMENT

Mrs. Eugene P. Willett, a/k/a Helen Willett  
c/o Elizabeth's House of Gifts, Daphne, Ala. Defendant  
~~Elizabeth's House of Gifts-Garnishee~~

Executed by Service on

Defendant

Notice of Garnishment,

This.....day of.....196.....

Sheriff Mobile County

By ..... Deputy Sheriff

Executed by Service on

Garnishee

This.....day of.....196.....

Sheriff Mobile County

By ..... Deputy Sheriff

**THE COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY**

REC'D SHERIFF DEPT.  
MOBILE COUNTY, ALA.

DEC 10 4 05 PM '70

BY

## NOTICE TO GARNISHEE

REPORT TO GENERAL SESSIONS  
COURTROOM "B" FIRST FLOOR

THE STATE OF ALABAMA  
COUNTY OF MOBILE

To the Sheriff of Mobile County—Greetings:

YOU ARE COMMANDED TO SUMMON Elizabeth's House of Gifts, Daphne, Ala., Garnishee,

to be and appear before the Court of General Sessions of Mobile County, at the Courthouse of Mobile County, on the 26 day of Jan, 19 71, at the hour of 9:00 A.M., or answer on oath in writing,

as Garnishee, in what amount, if any, it was indebted to Mrs. Eugene P. Willett, a/k/a Helen

Willett, Defendant, at the time of the service of this Writ of Garnish-

ment, or at the time of making said answer thereto, or at any time intervening the service of this Writ of Garnish-

ment and making the said answer, and whether it will be indebted in the future to said defendant by a con-

tract existing at the time of the serving of this Writ of Garnishment, or at the time of making the said answer, and

whether it has in its possession, or under its control any personal or real property or things in action

belonging to said defendant.

Witness my hand this \_\_\_\_\_ day of DEC 9 - 1970, 19\_\_\_\_.

J. B. Richardson  
Clerk of the Court of General Sessions of Mobile County

# NOTICE TO GARNISHEE

Attorney for Plaintiff:

Feibelman & Silver

No. 91,008

Ret. Jan 26, 1971

Bellas Hess Superstore, Inc. of Mobile, a corporation  
Plaintiff.

12/17 vs.

Mrs. Eugene P. Willett, a/k/a Helen Willett  
c/o Elizabeth's House of Gifts  
Daphne, Ala.

12/17 Defendant  
Elizabeth's House of Gifts  
Daphne, Ala.

Mrs L E Rockwell Garnishee  
Claim . . . . \$ 407.93  
Cost . . . . \$ 11.10  
Total . . . . \$ 419.03  
mileage 10.80  
429.83

COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY

REC'D. SHERIFF DEPT.  
MOBILE COUNTY, ALA.

DEC 10 4 30 PM '70

BY

REC'D. SHERIFF DEPT.  
MOBILE COUNTY, ALA.

DEC 23 8 11 AM '70

BY

Received 15 day of Dec. 1970  
and on 17 day of Dec. 1970

I served a copy of the within Writ

on Elizabeth's House of Gifts

By service on Mrs. L-E. Rockwell

TAYLOR WILKINS, Sheriff

TO THE GARNISHEE: If you prefer not to appear in Court on the day and hour stated in this writ, the law permits you to file in the office of the Clerk of this Court a written statement, sworn to by you before a Notary Public, before the return date shown on this writ of garnishment, which written statement must contain the information called for in this writ of garnishment. If defendant is employed, you must commence withholding 25% of wages until full amount of garnishment and costs are collected. If further clarification is needed, we suggest you consult your lawyer.

# The Court of General Sessions of Mobile County

THE STATE OF ALABAMA,  
Mobile County

## NOTICE TO DEFENDANT

Bellas Hess Superstore, Inc. of Mobile,  
a corporation

Plaintiff

Mrs. Eugene P. Willett a/k/a Helen Willett  
c/o Elizabeth's House of Gifts Defendant  
Daphne, Ala.

Elizabeth's House of Gifts  
Daphne, Ala.

Judgment - - - - - \$.....

Interest - - - - - \$.....

Costs of Judgment - - - - - \$.....

Costs of Garnishment - - - - - \$.....

Total - - - - - \$.....

Garnishees.

Take notice that I have this day issued a Writ of Garnishment, summoning  
Elizabeth's House of Gifts, Daphne, Ala.

to appear before the Court of General Sessions of Mobile County, on the 26 day of Jan,  
19 71 at 9:00 A. M., to answer an oath as Garnishee. whether they were indebted to you or not.

Given under my hand this..... day of DEC 2 - 1970, 19 .....

[Signature]  
Clerk of The Court of General Sessions of Mobile County

Attorney for Plaintiff:

Feibelman & Silver

Case No. 91,008

**NOTICE TO DEFENDANT**

Bellas Hess Superstore, Inc. of Mobile,  
a corporation Plaintiff

VS.

Mrs. Eugene P. Willett, a/k/a Helen Willett  
c/o Elizabeths House of Gifts, Daphne, Ala. Defendant

Elizabeth's House of Gifts  
Daphne, Ala. Garnishees

Judgment ..... \$ 407.93

Cost ..... \$ 11.10

Garnishment ..... \$ 419.03

mileage ..... 10.80

429.83

COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY

Received 15 day of Dec. 1970  
and on 17 day of Dec. 1970  
I served a copy of the within notice  
on Mrs. Eugene P. Willett

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. Crook D. S.

JAMES R. OWEN  
ATTORNEY AT LAW  
110 COURTHOUSE SQUARE  
BAY MINETTE, ALABAMA 36507

February 9, 1971

P. O. BOX 248  
TEL 937-2061  
AREA CODE 205

Mr. J. D. Richardson  
Clerk of the Court of  
General Sessions  
Mobile County Courthouse  
Mobile, Alabama 36601

Dear Mr. Richardson:

I enclose motion to set aside judgment in  
case of Bellas Hess vs. Willett, Case No. 91,008.

I would appreciate it if you would give me  
notice when the motion is set for hearing.

Yours very truly,



JAMES R. OWEN

JRO/ers

Enclosure



BELLAS HESS SUPERSTORE, INC., )  
OF MOBILE, a corporation, )  
Plaintiff, )  
VS. )  
EUGENE P. WILLETT and )  
HELEN WILLETT, )  
Defendants. )

IN THE COURT OF GENERAL  
SESSIONS OF MOBILE COUNTY  
NO. 91,008

MOTION TO SET ASIDE JUDGMENT

Now comes the defendant, Helen Willett, and shows unto the court and your Honor as follows:

1. That this court heretofore made and entered a judgment against the defendant, Helen Willett, in the amount of Four Hundred Seven and 93/100 Dollars (\$407.93), together with costs of court of \$11.10, which said judgment was rendered on November 17, 1970.

2. The summons and complaint in this cause was endorsed thereon "Executed by service on Mr. and Mrs. Eugene P. Willett October 29, 1970," which said endorsement was signed by a Deputy Sheriff of Mobile County.

3. The defendant, Helen Willett, shows unto the court that she has never been served with a copy of the summons and complaint in this cause; that she was residing in Baldwin County, Alabama, on October 29, 1970; had been separated from her husband, Eugene P. Willett, for several months before October 29, 1970; that she was not in Mobile County on October 29, 1970, the date of the purported service of the summons and complaint on her.

5. That she has never been served with a copy of the summons and complaint in this cause and the first notice that she had of any pending action against her by the plaintiff was when she was served with a notice that a writ of garnishment had been issued out of this court during the month of December, 1970.

WHEREFORE, the defendant, Helen Willett, moves the court to set aside and hold as null and void the said judgment against her heretofore rendered in this cause on November 17, 1970.

COURT OF GENERAL  
SESSIONS  
FEB 10 11 58 AM '71

*Helen Willett*  
Helen Willett

STATE OF ALABAMA     )  
                              \*  
BALDWIN COUNTY        )

Before me, the undersigned authority, personally appeared  
Helen Willett, who first being duly and legally sworn deposes and  
says:

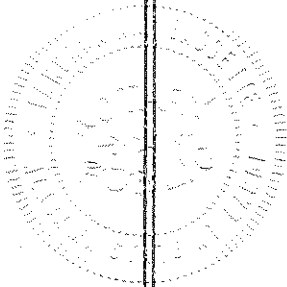
That she is one of the defendants in the above styled cause;  
that she has read over the foregoing petition and that the facts  
stated therein are true.

Helen Willett

Sworn to and subscribed before me on  
this the 2nd day of February, 1971.

Barbara Ann Baggett  
Notary Public, Baldwin County, Alabama

MY COMMISSION EXPIRES 10/16/72



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 9th day  
of Feb., 19 71.

[Signature]  
Attorney for Defendant, Helen Willett

9-70

## DEFENDANT EXECUTION

THE STATE OF ALABAMA, }  
Mobile County

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

WHEREAS on the 17 day of Nov, 1970Bellows Dress Superstore, Inc.  
recovered a Judgement before the Court of General Sessions of Mobile County againstMrs. Eugene P. Willitt aka Helen Willitt  
for the sum of \$407.93 Dollarsdebt or damages; also \$6.60 Dollars for cost of suit:

YOU ARE HEREBY COMMANDED, of the goods and Chattels of the said Defendant,

Mrs. Eugene P. Willitt aka Helen Willitt

to make the said sums, and have the same at the Court of General Sessions of Mobile to render to the Plaintiff for debt and costs aforesaid.

Herein fail not, and make return of this Writ according to law.

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_, 19

NOV 24 1970

J.D. Richardson

Clerk, Court of General Sessions of Mobile County

*Feibelman & Silver*  
Attorney for Plaintiff

No. 91008

**DEFENDANT EXECUTION**

*Bellows Dress Superstore, Inc.*

Plaintiff

VS.

*Mr. Eugene P. Willitt aka  
Eileen Willitt*

Defendant

Recapitulation:

Judgment: \$407.93

County: 3.10

Execution: .50

Witness:

Sheriff: 3.00

Commission: 20.40

To the Sheriff— 434.93

The judgment upon which this execution is issued waives all right of exemptions as to personal property, you will therefore not allow any exemptions as to personal property for the satisfaction of this execution.

*J. D. Richardson*  
Clerk of the Court of General  
Sessions of Mobile County

REC'D. SHERIFF DEPT.  
MOBILE COUNTY, ALA.

NOV 25 4 08 PM '70

BY \_\_\_\_\_

Received 11/25/70

Returned 11/25/70

No property of def. found  
in my County.

RAY D. BRIDGES, Sheriff

By L. W. Nixon D. S.


BELLAS HESS SUPERSTORE, INC., )  
OF MOBILE, )  
Plaintiff, )  
VS. )  
EUGENE P. WILLETT and MRS. )  
EUGENE P. WILLETT, also known as )  
Helen Willett, )  
Defendants. )

IN THE COURT OF GENERAL  
SESSIONS OF MOBILE COUNTY  
NO. 91,008

PLEA IN ABATEMENT

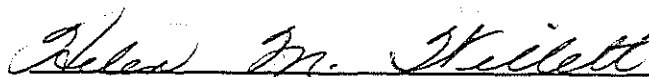
Now comes Helen Willett, one of the defendants in the above styled cause, for the special purpose of filing the following plea and for no other purpose:

The said Helen Willett says that at the time said suit was instituted and at the time said cause of action arose she was a bona fide resident of Baldwin County, Alabama, and that the court of General Sessions of Mobile County, Alabama, is without jurisdiction to try this suit.

  
Attorney for Defendant

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

Before me, the undersigned authority within said State and County, personally appeared Helen Willett, one of the defendants in the above styled cause, who, being by me first duly sworn, says, on oath, that the facts set forth in the foregoing plea are true and correct.

  
Helen M. Willett

Sworn to and subscribed before me  
on this the 15th day of March, 1971.

  
Notary Public, Baldwin County, Alabama

COURT OF GENERAL  
SESSIONS  
MY COMMISSION EXPIRES 10/16/72

MAR 22 11 10 AM '71

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 19th day of March, 1971.

  
Attorney for Defendant

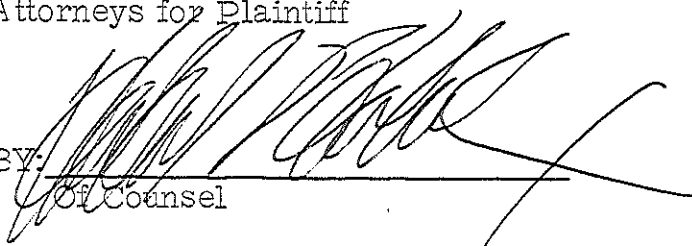
BELLAS HESS SUPERSTORE, INC. : IN THE COURT OF GENERAL  
OF MOBIL Plaintiff, : SESSIONS OF MOBILE COUNTY,  
vs. : ALABAMA  
MRS. EUGENE WILLETT, et al, :  
Defendants : CASE NO. 91,008

DEMURRER TO PLEAS IN ABATEMENT

Comes now Plaintiff in the above captioned matter and demurs to the Plea in Abatement heretofore filed by Helen Willett, and as grounds therefore says as follows:

1. For that said Plea does not state a defense to this cause of action.
2. For that sufficient facts are not alleged to constitute grounds for abatement.
3. For that there affirmatively appears from the court files that said Defendant previously waived objections to venue by filing a document entitled "Motion to Set Aside Judgment" dated November 17, 1970.
4. For that the pleading heretofore filed by this Defendant entitled "Motion to Set Aside Judgment" in no way purported to be a special appearance by this Defendant and constituted a general appearance waiving any objections to venue.

FEIBELMAN & SILVER  
Attorneys for Plaintiff

BY:   
Of Counsel

This matter is set for hearing April 6, 1971.

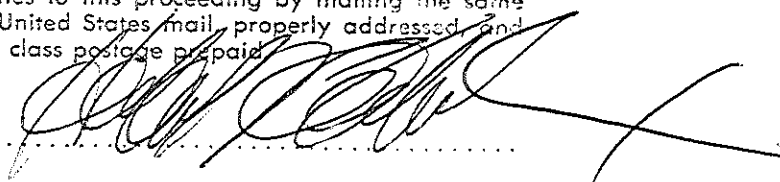
**CERTIFICATE OF SERVICE**

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

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, and first class postage prepaid.

COURT OF GENERAL  
SESSIONS

MAR 30 11 22 AM '71



80016

JAMES R. OWEN  
ATTORNEY AT LAW  
110 COURTHOUSE SQUARE  
BAY MINETTE, ALABAMA 36507

March 18, 1971

P. O. BOX 248  
TEL. 937-2061  
AREA CODE 205


Mr. J. D. Richardson, Clerk  
Court of General Sessions  
Mobile County Courthouse  
Mobile, Alabama 36601

In Re: Case No. 91,008

Dear Mr. Richardson:

I enclose plea in abatement in the case of  
Bellas Hess vs. Willett and ask that you notify me  
when the plea is set for hearing.

Yours very truly,



JAMES R. OWEN

JRO/ers

Enclosure

91008  
BELLAS HESS SUPERSTORE, INC.  
OF MOBILE, a corporation,

Plaintiff

vs.

MRS. EUGENE WILLETT, et al,

Defendants

: IN THE COURT OF GENERAL  
SESSIONS OF MOBILE COUNTY,  
:  
ALABAMA

: CASE NO. 91, 008

JOINDER OF ISSUE

Comes now Plaintiff in the above captioned matter and joins issue  
with the Defendant on her Plea in Abatement heretofore filed.

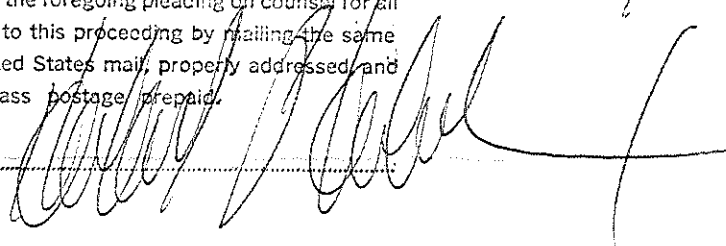
FEIBELMAN & SILVER  
Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I do hereby certify that I have on this 7<sup>th</sup>  
day of April, 19 71, 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.

BY: 

Of Counsel

  
This matter is set for hearing Tuesday, April 20, 1971.

COURT OF GENERAL  
SESSION

APR 6 12 10 PM '71



THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

Case No. 91008

BELLAS HESS SUPERSTORE, INC.  
OF MOBILE

Plaintiff,

vs

EUGENE P. WILLETT and MRS. EUGENE  
WILLETT also known as HELEN WILLETT  
jointly, separately and severally  
Defendant.

Amount of Claim: \$305.95

) Filed: October 15, 1970

) Summons Issued: October 16, 1970

) Returnable: November 17, 1970

) Service Had: October 29, 1970

) Cause of Action: Contract

) Attorney for Plaintiff: Feibelman & Silver

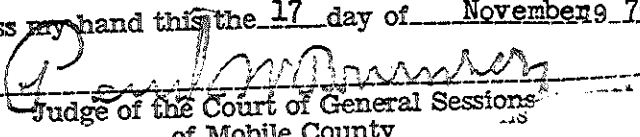
) Attorney for Defendant: A. C. LACEY (EUGENE)  
JAMES OWENS (MRS. WILLETT)

November 6, 1970 - Defendant, Eugene P. Willett, Answer filed  
November 17, 1970 - Eugene P. Willett Struck as Party Defendant  
November 17, 1970 - Judgment By Default vs Mrs. Eugene P. Willett, a/k/a Helen Willett  
\$407.93 - written contract, with waiver

This day came the plaintiff into open Court and this cause being regularly set for trial this day and the defendant being called, failing to appear, though having been duly summoned and it being after the hour of 9:30 A. M., the Court upon hearing the evidence orders and adjudges that the plaintiff have and recover of the defendant the sum of 407.93 Dollars debt or damages and the cost of these proceedings, for all of which let execution issue.

And against this judgment and the execution to be issued hereon there is no exemption of personal property of the defendant.

Witness my hand this the 17 day of November 1970

  
Judge of the Court of General Sessions  
of Mobile County

November 24, 1970 - Defendant Execution Issued

January 12, 1971 - Execution Returned -No Property Found

Above Execution returned to Court by Sheriff of Mobile  
County endorsed after diligent search no property found

1/12/71

Garnishment on Judgment Issued: 12/9/70

\$407.93

Garnishment on Judgment ~~Returned~~ 1/26/71

Garnishee: ELIZABETH'S HOUSE OF GIFTS

Service had on Garnishee: 12/17/70

Service had on Defendant: 12/17/70

March 9, 1971 - Set for Disposition

February 10, 1971 - Motion to set aside Judgment filed by Helen Willett

March 9, 1971 - Set on Motion to set Aside Judgment

March 9, 1971 - JUDGMENT SET ASIDE - GARNISHMENT PASSED TO MARCH 23, 1971 with Main  
Action

March 23, 1971 - On Main Action - Trial

March 22, 1971 - Defendant's, Helen, Plea in Abatement filed

April 6, 1971 - Set for Trial

March 30, 1971 - Demurrers to Plea in Abatement filed by Plaintiff

April 1, 1971 - Demurrer to Plea in Abatement of Helen Willett overruled.

*Paul W. Bowers*

April 6, 1971 - Set for Trial

April 2, 1971 - Attorney, Feibelman's, Secretary notified by phone

April 20, 1971 - Set for trial

April 8, 1971 - Plaintiff's "Joinder of Issue" filed

May 4, 1971 - Trial

May 4, 1971 - Plea Granted

May 4, 1971 - Cause Transferred to Circuit Court of Baldwin County..

*Paul W. Bowers*

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 6 day of May, 1971.

*Jed. Richardson*

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

**COST BILL**

ATTORNEYS FOR PLTF:—

General Sessions (Civil Div.) Court of Mobile, Mobile County Court House, Mobile, Ala.  
 BELLAS HESS SUPERSTORE, INC.

Plaintiff  
 MRS. EUGENE P. WILLETT, ETC.

CASE NO. 91008

Defendant

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 \$ 13.85

GRAND TOTAL \$

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 ~~XXXXXXXXXXXX~~  
~~XXXXXXXXXXXX~~

STATE OF ALABAMA, )  
MOBILE COUNTY )

BELLAS HESS SUPERSTORE, INC., OF MOBILE

Plaintiff

VS.

MRS. EUGENE P. WILLETT, ETC.

Defendant

To MRS. EUGENE P. WILLETT

in said Cause:

You are hereby notified that MRS. EUGENE P. WILLETT

the PLAINTIFF in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama from the ~~XXXXXXXXXXXX~~ 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 Baldwin County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 6 day of May 1971

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

Case No. 91008

BELLAS HESS SUPERSTORE, INC.

Plaintiff,

VS

MRS. EUGENE P. WILLETT

Defendant.

NOTICE OF ~~RECEIVED~~ TRANSFER

Returnable To The Circuit Court OF BALDWIN  
COUNTY

Issued: May 6, 1971

Serve On: MRS. EUGENE P. WILLETT  
C/o Elizabeth House of Gifts, Daphne, Ala.

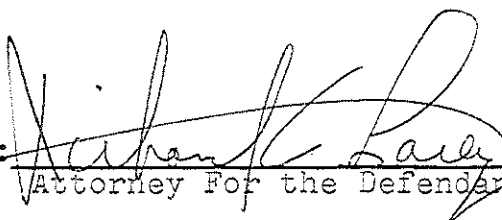
or c/o Attorney, James Owen

91008

BELLAS HESS SUPERSTORES, INC.	*	THE COURT OF GENERAL SESSIONS
OF MOBILE,	*	
	*	OF MOBILE COUNTY, ALABAMA
Plaintiff,	*	
VS.	*	AT LAW
	*	
EUGENE P. WILLETT and MRS.	*	
EUGENE P. WILLETT a/k/a	*	CASE NO. 91008
HELEN WILLETT,	*	
Defendant.	*	

Comes now the Defendant, EUGENE P. WILLETT, individual-ly and separately, and files this, his Answer to said Bill of Complaint:

- 1. The Defendant for answer to said Complaint saith that he is not guilty of the matters alleged therein.
- 2. The Defendant as a defense to the action of the Plaintiff, saith that at the time the action had commenced, the Defendant had terminated any agreement with the Plaintiff and that the indebtedness alleged in the Complaint was not made by the Defendant, or with his knowledge, or consent.
- 3. The Defendant as a defense to the action of the Plaintiff, saith that the alledged indebtedness was incurred by his former wife Helen Willett without the authority or know-ledge of the Defendant.

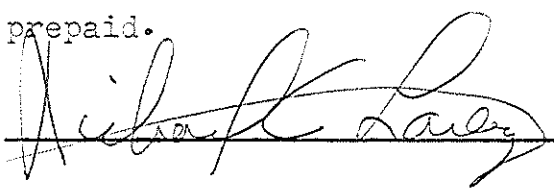
BY:   
Attorney For the Defendant

RICHARD C. LACEY  
Attorney At Law  
P. O. Box A-J  
Fairhope, Alabama 36532

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 3rd day of November, 1970, served a copy of the foregoing answer on Feibelman & Silver, Attorneys for Plaintiff, at 2103 First National, Mobile, Alabama, by mailing by United States Mail, properly ad-dressed, first class postage prepaid.

RECORDED & INDEXED  
Nov 6 11 51 AM '70



# COMPLAINT AND SUMMONS

Atty. for Plaintiff: Feibelman & Silver

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY

No. 91008

Ret.

Nov 17, 1970

Bellas Hess Superstore, Inc. of  
Mobile

VS.

Eugene P. Willett and Mrs. Eugene P.  
Willett also known as Helen Willett,  
jointly, separately and severally

Continued To

Defendant Eugene P. Willett may be served:

c/o Dixie Laboratories, Inc.  
604 Loeffler  
Mobile, Alabama

Defendant Mrs. Eugene P. Willett a/k/a Helen Willett may be served:

c/o Elizabeth House of Gifts  
Daphne, Alabama

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 Eugene P. Willett and Mrs. Eugene P. Willett  
also known as Helen Willett, jointly, separately and severally,

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile  
County, on the 17 day of Nov, 1970 at the hour of 9:00 A.M.,  
then and there to answer a complaint of Bellas Hess Superstore, Inc. of Mobile

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. OCT 1 5 1970

Witness my hand, this day of , 19

*J. D. Richardson*  
Clerk of the Court of General Sessions of Mobile County.

Cause of Action CAUSE OF ACTION: Plaintiff claims of Defendant (s) \$ 305.95  
due by written contract (s) made between Defendant (s) and  
Plaintiff on, to-wit: 12-16-65 COURT OF GENERAL SESSIONS  
and according to the terms of said contract (s) Defendant (s)  
waived all right to any exemption under the Constitution and  
laws of the State of Alabama and further agreed to pay a reasonable  
attorneys fee, which sum of money with the interest  
thereon is still due and unpaid. Plaintiff avers Defendant (s)  
defaulted under the terms of said contract (s) on, to-wit: 12-16-65

*[Signature]*  
FEIBELMAN & SILVER, Attorneys for Plaintiff



## 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 Eugene P. Willett and Mrs. Eugene P. Willett  
also known as Helen Willett, jointly, separately and severally,

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile  
 County, on the 17 day of Nov, 1970 at the hour of 9:00 A.M.,  
 then and there to answer a complaint of Bellas Hess Superstore, Inc. of Mobile

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: 16 1970

Witness my hand, this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_\_

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

Cause of Action CAUSE OF ACTION: Plaintiff claims of Defendant (s) \$ 305.95  
 due by written contract (s) made between Defendant (s) and \_\_\_\_\_

Plaintiff on, to-wit: 12-16-65  
 and according to the terms of said contract (s) Defendant (s)  
 waived all right to any exemption under the Constitution and  
 laws of the State of Alabama and further agreed to pay a reason-  
 able attorneys fee, which sum of money with the interest  
 thereon is still due and unpaid. Plaintiff avers Defendant (s)  
 defaulted under the terms of said contract (s) on, to-wit: \_\_\_\_\_

Feibelman & Silver  
 FEIBELMAN & SILVER, Attorneys for Plaintiff

Blue

# COMPLAINT AND SUMMONS

Atty. for Plaintiff: Feibelman & Silver

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY

No. 91008

Ret.

Bellas Hess Superstore, Inc., of  
Mobile

vs.

Eugene P. Willett and Mrs. Eugene P.  
Willett also known as Helen Willett,  
jointly, separately and severally

Continued To

Defendant Eugene P. Willett may be served:  
c/o Dixie Laboratories, Inc.  
604 Loeffler  
Mobile, Alabama

Defendant Mrs. Eugene P. Willett a/k/a Helen Willett may be served:  
c/o Elizabeth House of Gifts  
Daphne, Alabama

Executed by Service on

Mrs. Eugene P. Willett

Defendant

This 29 day Oct, 19 70

Ray D. Braddy  
Sheriff of Mobile County

By V. Braddy  
Deputy Sheriff

Mrs. Willett served in person  
Oct. 31/70 by Mr. R. P. Bea

REC'D SHERIFF  
MOBILE COUNTY

OCT 18 2 15

ay

TRANSFER

**NOTICE of ~~APPEAL~~**

STATE OF ALABAMA, )  
MOBILE COUNTY )

~~BELLAS HESS SUPERSTORE, INC., OF MOBILE~~

Plaintiff

VS.

MRS. EUGENE P. WILLETT, ETC.

Defendant

To MRS. EUGENE P. WILLETT

in said Cause:

You are hereby notified that MRS. EUGENE P. WILLETT

the ~~PLAINTIFF~~ in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, 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 Baldwin County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 6 day of May 1971

*Jed Richardson*  
Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 91008

9824

BELLAS HESS SUPERSTORE, INC.

Plaintiff,

VS

MRS. EUGENE P. WILLETT

Defendant.

NOTICE OF ~~ARREST~~ TRANSFER

Returnable To The Circuit Court OF BALDWIN  
COUNTY

Issued: May 6, 1971

Serve On: MRS. EUGENE P. WILLETT  
C/o Elizabeth House of Gifts, Daphne, Ala.

or c/o Attorney, James Owen

Received 11 day of May 1971  
and on 14 day of MAY 1971  
I served a copy of the within Notice of transfer  
on Mrs. Eugene P. Willett

By service on Mrs. Eugene P. Willett  
TAYLOR WILKINS, Sheriff  
By W. Cooke D. S.

REC'D SHERIFF DEPT.  
MOBILE COUNTY, ALA.  
TAYLOR WILKINS, SHERIFF OF BALDWIN  
COUNTY, ALABAMA, CLAIM \$1.50 EACH  
MAY 6 4 05 PM '71  
FOR DEPOSIT 1 PROCESS(ES) AND 54  
TRAVEL EXPENSE OF EACH OF \$ 5.40  
PROCESS(ES) OR A TOTAL OF \$ 6.90

CR

4/1/71  
Demurres to Plea in Abolishment  
of Helen Willett overruled

PWB

Bellas Hess

J.S

✓  
Willett

#91008