

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 Lester G. Peeblesto be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile County, on the 29th day of April, 19 71 at the hour of 9:00 A.M., then and there to answer a complaint of Household Finance Corporation, A Corp.

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 _____

MAR 11 1971

J. D. Richardson
Clerk of the Court of General Sessions of Mobile County.Cause of Action Plaintiff claims of Defendant \$ 717.24
due by promissory note ~~contract~~ made byhim on to wit: 11-14-69Defendant failed to pay said note ~~contract~~
according to its terms. By said note ~~con-~~
~~tract~~ defendant waived all right of exemp-
tion and agreed to pay a reasonable attor-
ney's fee, which is claimed in the amountof \$ 327.76J. Dwight ReedAttorneys for Plaintiff
Attorneys for PlaintiffCOURT OF GENERAL
SESSIONS

19

MAR 11 12:19 PM '71

COMPLAINT AND SUMMONS

Atty. for Plaintiff: Perloff, Reid & Briskman

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS
OF MOBILE COUNTY

No. 95185

Ret. April 29, 1971

Household Finance Corporation, A Corp.

VS.

Lester G. Peebles

Continued To

Home: 517 Collier Avenue, Bay Minette, Alabama

Employed: Bay Slacks Company, Bay Minette, 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:

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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_____

MAR 11 1971

J. D. Richardson
Clerk of the Court of General Sessions of Mobile County.Cause of Action Plaintiff claims of Defendant \$ 7,724
due by promissory note contract made by
him on to-wit: 11-14-69
Defendant failed to pay said note contract
according to its terms. By said note con-
tract defendant waived all right of exemp-
tion and agreed to pay a reasonable attor-
ney's fee, which is claimed in the amount
of \$ 32,76J. Dwight Reid
Attorneys for Plaintiff

COMPLAINT AND SUMMONS

Atty. for Plaintiff: Perloff, Reid & Briskman

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS
OF MOBILE COUNTY

No. 95185

Ret. April 29, 1971

Household Finance Corporation, A Corp. PROCESS(ES) OR A TOTAL OF \$ 1.50

VS.

Lester G. Peebles

Continued To

Home: 517 Collier Avenue, Bay Minette, Alabama

Employed: Bay Slacks Company, Bay Minette, Alabama

Received

3-18-71

J. Wilkins
Sheriff

Executed by Service on

Lester G. Peebles

Defendant

This 7 day April, 1971

Bel
Sheriff of Mobile County

By

W A Zalkert

Deputy Sheriff

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING 1 PROCESS(ES) AND
TRAVEL EXPENSE ON EACH OF \$ 0

A Corp. PROCESS(ES) OR A TOTAL OF \$ 1.50

REC'D SHERIFF DEP
MOBILE COUNTY, AL
APR 9 1 00 PM
BY

9518156

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

April 15, 1971

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


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

Dear Mr. Richardson:

I enclose plea in abatement in case
number 95185, Household Finance vs. Peebles.

Please advise me when this plea is
set for hearing in the event the plaintiff's
attorney will not confess it.

Yours very truly,



JAMES R. OWEN

JRO/ers

Enclosure

HOUSEHOLD FINANCE CORPORATION,)
a corporation,)
VS.)
LESTER G. PEEBLES)

IN THE COURT OF GENERAL
SESSIONS OF MOBILE COUNTY,
ALABAMA, NO. 95,185

PLEA IN ABATEMENT

Now comes the defendant in the above styled cause and appearing specially and only for the purpose of filing this plea, pleas that this cause be abated in Mobile County and as grounds therefor says:

1. That this is a cause of action ex contractu.

2. That the defendant is a resident of Baldwin County, Alabama, and was a resident of Baldwin County, Alabama, at the time of the cause of action arose and at the time the complaint in said cause was filed.

WHEREFORE, the premises considered, the defendant prays that this cause be abated in Mobile County, Alabama.

Lester G. Peebles
Lester G. Peebles

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority within and for said State and County, personally appeared Lester G. Peebles, who is known to me and who being by me first duly sworn deposes and says: That he is the defendant in the above styled cause; that he signed the above plea in abatement and that the matters and facts contained therein are true and correct.

Lester G. Peebles

Sworn to and subscribed before me on
this the 16TH day of April, 1971.

Ernestine R. Sims
Notary Public, Baldwin County, Alabama

COURT OF GENERAL
SESSION
APR 20 10 24 AM '71

THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

Case No. 95185

HOUSEHOLD FINANCE CORPORATION, A CORP.
Plaintiff,

VS

LESTER G. PEEBLES

Defendant.

Amount of Claim: \$717.24

Filed: March 10, 1971
Summons Issued: March 11, 1971
Returnable: April 29, 1971
Service Had: April 7, 1971
Cause of Action: Promissory Note
Attorney for Plaintiff: Perloff, Reid & Briskman
Attorney for Defendant: James A. Owens

April 20, 1971 - Defendant's Plea in Abatement filed

April 29, 1971 - Plea Confessed
Transferred to Circuit Court of Baldwin County

Thomas F. Sweeney

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.

J. D. Richardson
Clerk of The Court of General
Sessions of Mobile County
Alabama.

COST BILL

PERLOFF, REID & BRISKMAN

ATTORNEYS FOR PLTF:—

General Sessions (Civil Div.) Court of Mobile, Mobile County Court House, Mobile, Ala.
HOUSEHOLD FINANCE CORP., A CORP.

Plaintiff

LESTER G. PEEBLES

Defendant

CASE NO. 95185

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~~ ~~XXXXXX~~

STATE OF ALABAMA,
 MOBILE COUNTY

HOUSEHOLD FINANCE CORPORATION, A CORP.

Plaintiff

VS.

LESTER G. PEEBLES

Defendant

To LESTER G. PEEBLES

in said Cause:

You are hereby notified that LESTER G. PEEBLES

the PLAINTIFF in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, from 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 19 61

Joe D. Richardson

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

Case No. 95185

HOUSEHOLD FINANCE CORP., A CORP.

Plaintiff,

VS

LESTER G. PEEBLES

Defendant.

NOTICE OF ~~ARREST~~ TRANSFER

Returnable To The Circuit Court of
Baldwin County

Issued: May 6, 1971

Serve On: LESTER G. PEEBLES
517 Collier Ave., BayMinette, Ala

or c/o JAMES A. OWEN, Attorney

FILED

MAY 7 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

FROM

Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama 36507

PERLOFF, REID & BRISKMAN

Attorney at Law

257 ST. ANTHONY STREET

MOBILE, ALABAMA 36603 • TELEPHONE 433-5412

SUBJECT: Household Finance Corporation vs. Lester G. Peebles Case #9828
FOLD HERE

DATE

3/24/72

MESSAGE

Please enter a non-suit in the above captioned matter on motion of the plaintiff.

DATE

SIGNED

T. Dwight Reid

REPLY

SIGNED

HOUSEHOLD FINANCE CORPORATION,)
a corporation,)

Plaintiff,)

VS.)

LESTER G. PEEBLES,)

Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

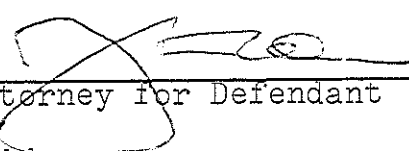
9828

PLEA


Now comes the defendant in the above styled cause and
for answer to the complaint heretofore filed in said cause, says:

1. The allegations of the complaint are untrue.

2. For further answer the defendant says that the
plaintiff, after the execution of said note referred to in the
complaint, agreed to transfer said note to a third party and
to relieve the defendant of further responsibility for the payment
of said note, which the said plaintiff wholly failed and refused
to do.


Attorney for Defendant

Defendant demands a trial of said
cause by jury.


Attorney for Defendant

FILED

SEP 14 1971

CLERK OF THE CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

TRANSFER
NOTICE of APPEAL XXXX XXXX XXXX

STATE OF ALABAMA,)
MOBILE COUNTY)

HOUSEHOLD FINANCE CORPORATION, A CORP.

Plaintiff

VS.

LESTER G. PEEBLES

Defendant

To LESTER G. PEEBLES

in said Cause:

You are hereby notified that LESTER G. PEEBLES

the PLAINTIFF in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, from 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

JoD. Richardson
Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 95185

15295
9828

HOUSEHOLD FINANCE CORP., A CORP.

Plaintiff,

VS

LESTER G. PEEBLES

Defendant.

NOTICE OF ~~APPEAL~~ TRANSFER

Returnable To The Circuit Court of
Baldwin County

Issued: May 6, 1971

Serve On: LESTER G. PEEBLES
517 Collier Ave., BayMinette, Ala.

or c/o JAMES A. OWEN, Attorney

Received 11 day of May 1971
and on 18 day of May 1971
I served a copy of the within Not. of transfer
on Lester G. Peebles

By service on James A Owen & attorney
TAYLOR WILKINS, Sheriff
By W A Gallard D. S.

TAYLOR WILKINS, SHERIFF-OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING _____ PROCESS(ES) AND
TRAVEL EXPENSE ON EACH OF \$ _____
PROCEEDING OR A TOTAL OF \$ _____

REC'D SHERIFF DEPT.
MOBILE COUNTY, ALA.

MAY 6 4 05 PM '71

T

NOTICE of APPEAL

STATE OF ALABAMA,)
MOBILE COUNTY)

HOUSEHOLD FINANCE CORPORATION, A CORP.

Plaintiff

VS.

LESTER G. PEEBLES

Defendant

To LESTER G. PEEBLES

in said Cause:

You are hereby notified that LESTER G. PEEBLES

the PLAINTIFF in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, from 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.

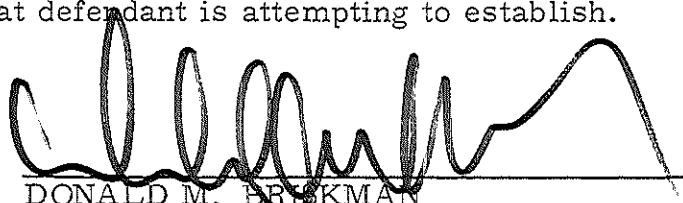
Given under my hand this the 6 day of May 19 71

J. D. Richardson
Clerk, Court of General Sessions of Mobile County, Civil Division

HOUSEHOLD FINANCE CORP-) IN THE CIRCUIT COURT OF
ORATION, a corporation,)
) BALDWIN COUNTY, ALABAMA,
Plaintiff,) AT LAW
vs.)
LESTER G. PEEBLES,)
Defendant.) CASE NO. ⁹⁸²⁸~~95,185~~

Comes now the plaintiff in the above captioned cause and demurs to the answer of the defendant and to each plea thereof on the following grounds, separately and severally:

1. For that said plea is but a mere conclusion of the pleader.
2. The allegations contained in said plea are but mere conclusions of the pleader.
3. For said plea is nonsensical and does not state a defense to plaintiff's cause of action.
4. Said plea does not state a defense to plaintiff's cause of action.
5. For that said plea is so vague and ambiguous that your plaintiff is properly apprised as to what defendant is attempting to establish.


DONALD M. BRISKMAN
Attorney for Plaintiff

CERTIFICATE OF SERVICE
I do hereby certify that I have on this 28
day of October, 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.
3/ Donald M. Briskman

FILED

NOV 3 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

COLE & WYATT

ATTORNEYS AT LAW

1801 NINTH AVENUE, SOUTH

BIRMINGHAM, ALABAMA 35205

Telephone 322-5509

September 17, 1971

John L. Cole
Charles H. Wyatt, Jr.

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

RE: Lanco-Montgomery Federal Credit Union
vs. C. B. Perry
Case No. 9827

Dear Mrs. Blackmon:

Would you please let this letter serve as our Motion
to Dismiss the above styled case. The account has been paid.
Please forward to us your costs bill.

Yours truly,

COLE & WYATT

Charles H. Wyatt, Jr.

Charles H. Wyatt, Jr.

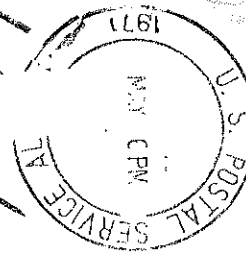
CHWjr/sdd

THE COURT OF GENERAL SESSIONS

MOBILE COUNTY COURT HOUSE

MOBILE, ALABAMA 36602

U.S. POSTAL SERVICE
MAY 1971
MAY 1971



EISENHOWER-USA



EISENHOWER-USA



EISENHOWER

MRS. ALICE J. DUCK, Circuit Clerk
Baldwin County Court House
Bay Minette, Alabama

2286
THE enclosed papers numbered from 1 to 6, include all the original
papers in the case of HOUSEHOLD FINANCE CORP., A CORP. VS LESTER G. PEEBLES Case #95185

Jo D. Richardson

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