

| | | |
|-----------------------|---|----------------------------|
| GULF SOUTH FINANCIAL |) | IN THE COURT OF GENERAL |
| CORP., a corporation, |) | SESSIONS OF MOBILE COUNTY, |
| PLAINTIFF, |) | ALABAMA CASE #96,726 |
| -vs- |) | |
| JOHN CLIFTON PAUL and |) | |
| TINY SUE PAUL, |) | |
| DEFENDANTS. |) | |

PLEA TO THE VENUE

Comes the defendants in the above entitled cause, appearing specially and only for the purpose of filing this plea and say that the said Gulf South Financial Corp., a corporation, plaintiff, ought not to have and to maintain its said action, for the defendants say separately and severally, as follows, to-wit:

FIRST:

That the said defendants are permanent residents of Baldwin County, Alabama, and are not residents of Mobile, County, Alabama.

SECOND:

That the said defendants resided in Baldwin County, Alabama at this address when the alleged evidence of indebtedness was executed and have continued to reside at the said address until the present date; residing in the County of Baldwin when the cause of action arose.

THIRD:

That the said defendants have never resided in Mobile County, Alabama.

WHEREFORE, the defendants say that the Court of General Sessions of Mobile County, Alabama is without jurisdiction to try and determine this cause, and that this said action should be abated, and pray the judgment of this Honorable Court whether the plaintiff should be allowed to further maintain this suit.

COURT OF GENERAL
SESSION
MAY 18 12 37 PM '71

McDERMOTT & SLEPIAN

ATTORNEYS AT LAW
211 NORTH CONCEPTION STREET
MOBILE, ALABAMA

WILLIAM H. McDERMOTT
RONALD P. SLEPIAN
BRAXTON L. KITTRELL, JR.
WILLIAM ROY WILLARD, JR.
CHARLES J. FLEMING

36601

MAILING ADDRESS:
POST OFFICE DRAWER 2025
PHONE 432-1671

January 6, 1972

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

Re: Gulf-South Financial Corp.

-VS-

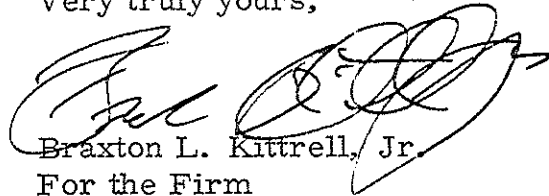
John Clifton Paul and Tiny
Sue Paul
Circuit Case No. 9877

Dear Mrs. Blackmon:

The captioned matter is now set for trial in the Circuit Court of Baldwin County on January 21, 1972. At the request of the Plaintiff, please dismiss this matter with prejudice and forward the costs bill to the undersigned.

Thank you for your courtesy and cooperation.

Very truly yours,


Braxton L. Kittrell, Jr.
For the Firm

BLK, JR/jkc

cc: Honorable C. LeNoir Thompson