

UNIVERSITY CHRYSLER-
PLYMOUTH-DODGE, INC.,
a corporation,

Plaintiff,

vs.

RODGER E. TINDAL,

Defendant.

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 10,071

Comes now the Defendant in the above styled cause and for plea to the Complaint heretofore filed in said cause says, separately and severally, as follows:

1. The allegations of the Complaint are untrue.
2. The Defendant claims of the Plaintiff, by way of recoupment, the sum of Nine Thousand Five Hundred Dollars (\$9,500.00), as damages for that heretofore on, to-wit: the 11th day of October, 1971, the Plaintiff filed a suit in detinue in the Circuit Court of Baldwin County, Alabama, against the Defendant claiming an automobile of the Defendant with the value of the hire or use thereof during the detention; that the Defendant thereupon filed a proper replevy bond with the Clerk thereby retaining possession and the right to possession of said automobile during the pendency of said suit; that on, to-wit: the 27th day of March, 1972, while said suit was still at issue in the Circuit Court of Baldwin County, Alabama, the Plaintiff, acting by and through an agent, servant or employee, unlawfully entered the property of the Defendant and removed therefrom the automobile which was the basis of said detinue action and that the act of the Plaintiff in thus trespassing upon the Defendant's property was committed wilfully or wantonly and was attendant with malice or fraud and the De-

fendant claims of the Plaintiff compensatory damages and punitive damages as a result of the trespass of the Plaintiff as aforesaid.

CHASON, STONE & CHASON

By: John E. Chason
Attorneys for Defendant

The Defendant respectfully demands
a trial of this cause by a jury.

CHASON, STONE & CHASON

By: John E. Chason
Attorneys for Defendant

Plaintiff may be served through
its Attorney of Record, Tolbert
Brantley of the firm of Wilters &
Brantley, Bay Minette, Alabama.

FILED

OCT 30 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

10,071

University Chrysler.
Plymouth-Vodge, Inc.
a Corp.

vs.

Rodger E. Gindal

FILED

OCT 30 1972

EUNICE B. BLACKMON CIRCUIT
CLERK 4

RECEIVED

OCT 30 1972

TAYLOR WILKINS
SHERIFF

Chason, Stone & Chason -
Att. for Pkt.

Received

day of

19

and on 30

day of

OCT 1972

I served a copy of the within

Complaint

on

Robert Brantley

By service on

Taylor Wilkins Sheriff

By M. B. Gindal D. S.

HARRY J. WILTERS, JR.
TOLBERT M. BRANTLEY

LAW OFFICES OF
WILTERS & BRANTLEY
P. O. BOX 968
BAY MINETTE, ALABAMA 36507

PHONE
BAY MINETTE 937-5533

October 25, 1972

Mrs. Eunice Blackmon
Circuit Clerk
Bay Minette, Alabama

Dear Mrs. Blackmon:

Please dismiss the suit of University Chrysler-Plymouth-
Dodge v. Tindal, #10,071.

Yours truly,



T. M. Brantley

TMB/jcw

cc Hon. John E. Chason
Attorney at Law
Bay Minette, Ala.