

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Goffrey Dale Jones to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Alexander Smith, Jr.

WITNESS my hand this 8 day of November, 1971.

Eunice B. Blackmon
Clerk

The defendant resides at Route 1, Box 22, Daphne, Alabama.

* * * * *

ALEXANDER SMITH, JR.,)
Plaintiff,) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA
GOFFREY DALE JONES,) AT LAW
Defendant.)

10.107

C O M P L A I N T
C O U N T O N E

Plaintiff claims of the defendant Five Hundred Dollars (\$500.00) for that heretofore on to-wit, June 15, 1971, the defendant so negligently operated an automobile on Alabama Highway 16, which is a public highway in Baldwin County, Alabama, between the Baldwin County line and Pineda Drive, so as to cause the said motor vehicle to run into, upon, or against an automobile being driven by the plaintiff on said Alabama Highway 16 at said time and place and where he had a right to be and as a result of the negligence of the said defendant, the plaintiff's automobile was damaged as follows: the front grill; right fender and right side of plaintiff's automobile was bent broken and damaged, all to his damages aforesaid, hence this suit.

FILED

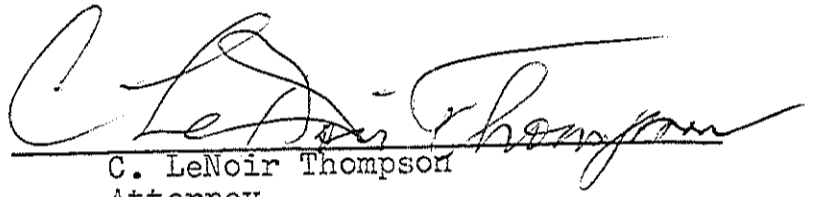
NOV 8 1971

[Signature]
Attorney for Plaintiff

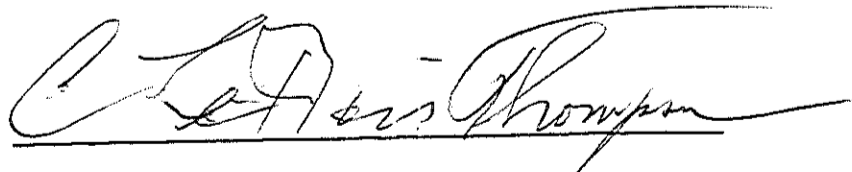
EUNICE B. BLACKMON CIRCUIT CLERK

ALEXANDER SMITH JR. * IN THE CIRCUIT COURT OF
PLAINTIFF * BALDWIN COUNTY, ALABAMA
VS * AT LAW.
GOFFREY DALE JONES * CASE NO. 10,107
DEFENDANT *

Comes C. LeNoir Thompson, attorney for Goffrey Dale Jones, in the above styled cause and being informed of the employment by the said Goffrey Dale Jones of competent counsel viz: Honorable Kenneth Cooper, the said C. LeNoir Thompson respectfully withdraws as counsel for the said Goffrey Dale Jones.


C. LeNoir Thompson
Attorney
P. O. Box 359
Bay Minette, Alabama 36507

I hereby certify that I have this the 22 day of March, 1975, served a copy of the foregoing withdrawal on Honorable Kenneth Cooper, Attorney at Law, Bay Minette, Alabama and Mr. Goffrey Dale Jones, Rt. 1, Box 22, Daphne, Alabama 36526, by depositing a copy of same in the United States mail postage prepaid.



FILED

MAR 24 1975

EUNICE B. BLACKMON CIRCUIT
CLERK

ALEXANDER SMITH, JR.

Plaintiff

-VS-

GOFFREY DALE JONES

Defendant

§ IN THE CIRCUIT COURT OF
§ BALDWIN COUNTY, ALABAMA
§ CIVIL ACTION
§ CASE NO. 10,107
§

ANSWER

Now comes Goffrey Dale Jones, the defendant in the above styled cause, and in obedience to the notice heretofore served on him in this cause for a statement of his assets, and says:

Assets:

1. One 1974 Pinto (Ford) Automobile, used, purchased 9-30-74 from Bolton Ford in Mobile, Alabama. Paid for by William A. Jones, father of defendant and amount owed on said automobile is \$2,500.00.

2. Personal clothing - 2 suits, 8 pair pants, 8 shirts, miscellaneous underwear and socks, 3 pair shoes, and other items of clothing; value \$200.00.

3. Income is \$146.00 per month, from Social Security Disability.

Goffrey Dale Jones
DEFENDANT

Subscribed and sworn to before me this 21st day of November, 1974.

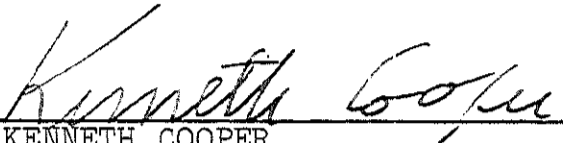
My Commission Expires:
February 4, 1975

Kenneth Toomer
NOTARY PUBLIC
STATE AT LARGE, STATE OF ALABAMA

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the above and foregoing Answer on Honorable James R. Owen, counsel of record for the Plaintiff, by placing a copy of same in the United States Mail, postage prepaid and addressed to his regular mailing address.

This 21st day of November, 1974.


KENNETH COOPER
ATTORNEY FOR DEFENDANT
Post Office Box 1000
Bay Minette, Alabama 36507

FILED

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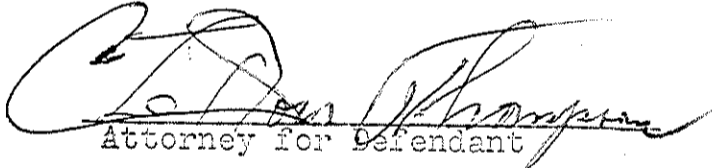
EUNICE B. BLACKBURN CIRCUIT
CLERK

ALEXANDER SMITH, JR.,) IN THE CIRCUIT COURT OF
Plaintiff,)
VS.) BALDWIN COUNTY, ALABAMA
GOFFREY DALE JONES,)
Defendant.) AT LAW. CASE NO. 10,187

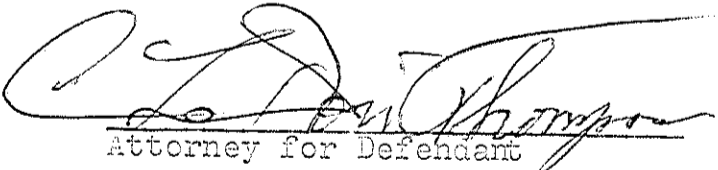
DEMURER

Come the Defendant in the above styled cause and demurs to the complaint filed there-in and for demurer says:

1. That said complaint failed to state a cause of action.
2. That said complainant fails to allege that the Plaintiff has a right to be at the point and place alleged at the time of said allege accident.
3. That said Plaintiff failed to allege that he is the owner of said automobile, which he alleged he was operating at the time and place complained of.


Attorney for Defendant

Defendant respectively ask for trial by jury.


Attorney for Defendant

I hereby certify that I have this 3 7 day of January, 1972 served a copy of the foregoing demur upon Honorable J. R. Owen, Attorney for Plaintiff.

Postage prepaid

FILED

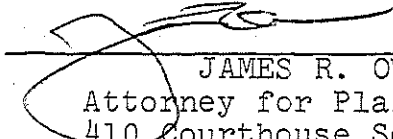
JAN 7 - 1972

ALEXANDER SMITH, JR.,)
Plaintiff,)
VS.)
GOFFREY DALE JONES,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 10,107

REQUEST FOR DISCOVERY ASSETS

The Plaintiff herein having recovered at the December 27, 1972, term, a judgment against the Defendant in the above styled cause for the sum of Five Hundred and no/100 (\$500.00) Dollars and costs in the amount of \$22.40, and execution having been returned endorsed by the Sheriff of Baldwin County, Alabama, "No Property Found", the Plaintiff now requests in writing that the Clerk of this Court issue a Notice to the above named Defendant requiring him, within thirty days from the service of such notice, to file in this cause a statement in writing, under oath, of all of his assets of every kind, character and description wheresoever located as provided by Title 7, Section 903 of the Code of Alabama.


JAMES R. OWEN
Attorney for Plaintiff
410 Courthouse Square
Bay Minette, Alabama

FILED

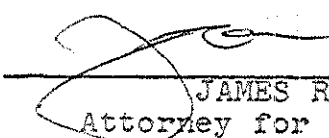
OCT 31 1974

EUNICE B. BLACKMON CIRCUIT
CLERK

ALEXANDER SMITH, JR.,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW NO. 10,107
GOFFREY DALE JONES,)	
Defendant.)	

REQUEST FOR DISCOVERY ASSETS

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 JAMES R. OWEN
 Attorney for Plaintiff
 410 Courthouse Square
 Bay Minette, Alabama

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ALEXANDER SMITH, JR.,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW NO. 10,107
GOFFREY DALE JONES,)	
Defendant.)	

NOTICE

TO: Goffrey Dale Jones
 Rt. 1, Box 22
 Daphne, Alabama

Take notice that whereas the Plaintiff in the above styled cause has requested in writing the undersigned, as Clerk of said Court, to issue notice to you, as Defendant, in the above styled cause and in the judgment therein, requiring you to file a statement in writing, under oath, of all of your assets, as provided by Title 7, Section 903 of the Code of Alabama and has filed said request in writing in this cause with the undersigned, as Clerk of this Court, and it appearing from said request and the record in said cause that an execution was returned on the judgment in this cause endorsed "No Property Found" by the Sheriff of Baldwin County and that you reside in the State of Alabama.

NOW, therefore, you are hereby required within thirty days from the service hereof to file in this Court a statement in writing, under oath, of all of your assets, including money, choses in action, notes and bonds and accounts and all other property, real, personal or mixed or any interest therein with a detail description of the same, the location and reasonable value of each item thereof, together with a detail list or statement of any and all liens, mortgages or encumbrances thereon, showing the amount upon each and the owner or holder of such liens, encumbrances, or mortgages.

WITNESS my hand this 31st day of October, 1974.

FILED

OCT 31 1974

Eunice B. Blackmon
 CLERK

EUNICE B. BLACKMON CIRCUIT CLERK

ALEXANDER SMITH, JR.,

Plaintiff,

VS.

GOFFREY DALE JONES,

Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 10,107

TO ANY SHERIFF IN THE STATE OF ALABAMA: GREETINGS,
YOU ARE HEREBY COMMANDED TO SERVE THE FOREGOING NOTICE UPON
DEFENDANT, GOFFREY DALE JONES, Rt. 1, Box 22, Daphne, Alabama,
AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

WITNESS, MY HAND AND SEAL ON THIS THE 31st DAY OF
OCTOBER, 1974.

Eunice B. Blackmen
CLERK, CIRCUIT COURT

