

301  
Jan 5, 1972

T. C. BETHEA, d/b/a  
SPANISH FORT SEPTIC TANK  
SERVICE,

Plaintiff

VS:

BETTY FRIZELLE,

Defendant

) IN THE COURT OF GENERAL SESSIONS OF  
) MOBILE COUNTY,  
) ALABAMA  
AT LAW

FILED

JAN 12 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

) CASE NO. 10,193

COUNT ONE

Plaintiff claims of the Defendant the sum of \$442.00 due from her by account on, to-wit, 1971, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized, verified account, which will be offered in evidence at trial.

COUNT TWO

Plaintiff claims of the Defendant the sum of \$442.00 due from her for work and labor done by the Plaintiff for the Defendant during the year 1971, at her request in Mobile County, Alabama, which sum of money, with the interest thereon, is still unpaid, and is the property of the Plaintiff.

GIBBONS & STOKES

BY:

Ben Stokes  
BEN STOKES  
Attorney for Plaintiff  
P. O. Box 293  
Mobile, Alabama 36601

Serve the Defendant c/o Calico Hill Stables, Point Clear, Alabama.

COURT OF GENERAL  
SESSION

Nov 15 1 31 PM '71

STATEMENT OF ACCOUNT

Creditor T. C. BETHEA, d/b/a SPANISH FORT SEPTIC TANK SERVICE  
Debtor BETTY FRIZELLE Address c/o Calico Hill Stables, Point Clear  
Employment \_\_\_\_\_ Address \_\_\_\_\_

Professional Services Rendered On Account \$ 442.00  
Merchandise, Goods, Sold and Delivered On Account \$ \_\_\_\_\_  
Date of Last Charge 1971  
Date of Last Payment \_\_\_\_\_

SWORN STATEMENT OF CLAIM

STATE OF ALABAMA

COUNTY OF MOBILE

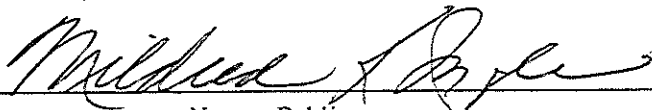
I hereby certify that the above account is just and correct and that all proper credits have been given and that the balance as indicated above is due and payable.

X 

Affiant

Sworn and subscribed to before me this

10th day of November 19 71

  
Notary Public

## COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS  
COURTROOM "B" FIRST FLOORThe State of Alabama,  
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

BETTY FRIZELLE

You are hereby commanded to summon.....

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile  
County, on the 5 day of January, 1972 at the hour of 9:00 A.M.,  
then and there to answer a complaint of T. C. BEATHEA, d/b/a SPANISH FORT SEPTIC TANK SERVICE

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

NOV 16 1971

19

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

Cause of Action

# COMPLAINT AND SUMMONS

Atty. for Plaintiff: GIBBONS & STOKES

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY

No. 301

Ret. January 5, 1972

T. C. BETHFA, d/b/a SPANISH FORT SEPTIC  
VS. TANK SERVICE  
BETTY PRIZELLE  
c/o Calico Hill Stables  
Point Clear, Alabama

Continued To

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 FLOOR

The State of Alabama, }  
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon BETTY FRIZELLE

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile County, on the 5 day of January, 1972 at the hour of 9:00 A.M., then and there to answer a complaint of T. C. BEATHEA, d/b/a SPANISH POINT SEPTIC TANK SERVICE

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\_\_\_\_

NOV 16 1971  
J. B. Richardson  
Clerk of the Court of General Sessions of Mobile County.

Cause of Action \_\_\_\_\_

# COMPLAINT AND SUMMONS

Atty. for Plaintiff: GIBBONS & STOKES

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY

No. 301

Ret. January 5, 1972

T. C. BETHEA, d/b/a SPANISH FORT SEPTIC  
VS. TANK SERVICE  
BETTY FRIZELLE  
c/o Calico Hill Stables  
Point Clear, Alabama

Continued To

NOV 19 1971

TAYLOR WILKINS  
SHERIFF

Executed by Service on

Betty Frizelle

Defendant

This 26 day Nov, 1971

Sheriff of Mobile County

By

Deputy Sheriff

TAYLOR WILKINS, SHERIFF OF BALDWIN

COUNTY, ALABAMA, COUNTY \$1.50 EACH

FOR SERVICE OF PROCESS(ES) AND

TRAVEL EXPENSE ON EACH OF \$10.00

PROCESS(ES) OR A TOTAL OF \$11.50 BY

REC'D SHERIFF DEPT  
MOBILE COUNTY, ALA

Nov 17 3 15 PM '71

REC'D SHERIFF DEPT  
MOBILE COUNTY, ALA

Nov 30 8 15 AM '71

BY

Received 19 day of Nov. 1971

and on 26 day of Nov. 1971

I served a copy of the within

on Betty Frizelle

By service on Betty Frizelle

TAYLOR WILKINS, Sheriff

By J. C. (1100K) D.S.

3-

JOHN V. DUCK  
Attorney at Law  
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Court of General Sessions  
Mobile County  
Mobile, Ala.

DATE December 7, 1971

Re: T. C. Bethea, dba Spanish Fort Septic Tank  
Service vs. Betty Frizelle. Civil Case 301

Dear Sir:

Enclosed please find Plea in Abatement to be filed in captioned case.

Sincerely,

*John V. Duck*  
John V. Duck (RH)

DATE

COURT OF GENERAL  
SESSION  
DEC 9 11 26 AM '71

SIGNED

SIGNED

24

T. C. BETHEA, d/b/a SPANISH )  
FORT SEPTIC TANK SERVICE, )  
Plaintiff, )  
vs. )  
BETTY FRIZELLE, )  
Defendant. )

IN THE COURT OF GENERAL  
SESSIONS, MOBILE COUNTY  
ALABAMA

AT LAW

CASE NO. 301

PLEA IN ABATEMENT

Comes now the Defendant, BETTY FRIZELLE, also known as BETTYE FRIZZELL, and shows unto the Court that this cause should be abated, and for grounds therefor, assigns the following separately and severally:

1. That the Defendant at the time that this cause of action arose, was a resident citizen of Baldwin County, Alabama, and is presently a citizen of Baldwin County, Alabama, and was a resident of Baldwin County, Alabama at the time said suit was brought, and that Mobile County has no jurisdiction over this cause, and hence this action should be abated.

  
BETTYE FRIZZELL

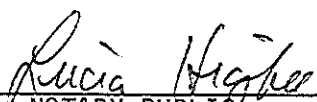
STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared BETTYE FRIZZELL, who being by me first duly and legally sworn, doth depose and say that the matters and facts alleged in the foregoing Plea in Abatement are true and correct.

  
BETTYE FRIZZELL

Sworn to and subscribed before me  
on this 7 day of December, 1971.

  
NOTARY PUBLIC

COURT OF GENERAL  
SESSION

DEC 9 11 26 AM '71

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 7 day of December, 1971

Attorney for

Defendant



THE UNITED STATES OF AMERICA  
DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION

WASHINGTON, D. C.  
JANUARY 10, 1950

MEMORANDUM

TO : DIRECTOR

FROM : SAC, NEW YORK

SUBJECT: [Illegible]

Reference is made to New York letter to Bureau dated 1/5/50, captioned as above, and to Bureau letter to New York dated 1/5/50, captioned as above. The New York letter to Bureau dated 1/5/50, captioned as above, contains information regarding the activities of [Illegible] and [Illegible] in the New York area. The Bureau letter to New York dated 1/5/50, captioned as above, contains information regarding the activities of [Illegible] and [Illegible] in the New York area. The New York letter to Bureau dated 1/5/50, captioned as above, contains information regarding the activities of [Illegible] and [Illegible] in the New York area. The Bureau letter to New York dated 1/5/50, captioned as above, contains information regarding the activities of [Illegible] and [Illegible] in the New York area.

301

[Illegible]

[Illegible]

[Illegible]

[Illegible]

[Illegible]

[Illegible]

RECEIVED JAN 10 1950

U.S. DEPT. OF JUSTICE

5

GIBBONS & STOKES

ATTORNEYS AT LAW  
160 CONGRESS STREET  
MOBILE, ALABAMA  
TELEPHONE 433-2611

E. GRAHAM GIBBONS  
BEN STOKES  
ROBERT F. CLARK  
JOHN T. BALLARD

December 13, 1971

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA 36601

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

RE: T. C. Bethea, d/b/a  
Spanish Fort Septic Tank  
Service vs Betty Frizelle  
Case No. 301

Dear Sir:

The defendant filed a plea in abatement. The plaintiff will confess to this plea. Please enter an order accordingly. Also, please transfer the case to Baldwin County Circuit Court.

Sincerely,

  
Ben Stokes

BS:cm

CC: Hon. John Duck  
Attorney at Law

COURT OF GENERAL  
SESSION  
DEC 14 10 57 AM '71

## 6

T. C. Bethea, d/b/a Spanish  
Fort Septic Tank Service

VS:

DEFENDANT

: Filed:	November 15, 1971
: Summons Issued:	November 16, 1971
: Returnable:	January 5, , 1972
: Service Had:	November 26, 1971
: Cause of Action:	IVA
: Attorney for Plaintiff:	Gibbons & Stokes
: Attorney for Defendant:	John V. Duck (Fairhope)
: Amount of Claim:	\$442.00

1/5/72: Plea Confessed  
Transfer to Circuit Court, Baldwin County

Thomas F. Sweeney

Witness my hand this the 11 day of January 1972.

J. S. 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.

T. C. Bethen, d/f/w Spanish Fort Septic TANK SERVICE

Plaintiff

Betty Frizekhe

Defendant

CASE NO. 301

Garnishee

**COURT FEES**

Summons and proceedings thereon to judgement .....	1.50	-----
Docketing each cause .....	1.00	-----
Execution .....	1.00	-----
Attachment Bond and Affidavit .....	2.50	-----
Law Library Fee .....	1.00	-----
Summoning Garnishee .....	1.00	-----
Every necessary certificate or notice not provided for .....	1.00	-----
.....	\$	-----
.....	TOTAL \$	-----

**SHERIFF'S FEES**

Levying Attachment .....	12.00	-----
Serving witness subpoenas .....	1.50	-----
Summoning Garnishee and making return .....	3.00	-----
Serving Summons and other mesne process, and returning the same .....	3.00	-----
Collecting execution for costs only .....	3.00	-----
Serving any summons not herein provided for, and making return .....	3.00	-----
Mileage .....		-----
.....		-----
.....	TOTAL \$	-----

GRAND TOTAL \$ 21.50

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~~

STATE OF ALABAMA, )  
MOBILE COUNTY )

T. C. Bethea, d/b/a Spanish Fort

Septic Tank Service

Plaintiff

VS.

Betty Frizelle

Defendant

To Betty Frizelle, the Defendant

in said Cause:

You are hereby notified that T. C. Bethea, d/b/a Spanish Fort Septic

Tank Service

the Plaintiff

a transfer to the Circuit Court of Baldwin County, Alabama in the above entitled cause has prayed and obtained ~~an appeal from the judgment thereon rendered by~~ from

~~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 11 day of January 1972

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

Case No. 301

T. C. Bethea, d/b/a Spanish  
Fort Septic Tank Service

Plaintiff,

VS

Betty Frizelle

Defendant.

NOTICE OF ~~RECEIVED~~ TRANSFER

Returnable To The Circuit Court of  
Baldwin County, Alabama

Issued: January 11, 1972

Serve On: Betty Frizelle  
c/o Calico Hill Stables  
Point Clear, Alabama

TRANSFER

# NOTICE of ~~APPEAL~~

STATE OF ALABAMA, )  
MOBILE COUNTY )

T. C. Bethea, d/b/a Spanish Fort

Septic Tank Service

Plaintiff

VS.

Betty Frizelle

Defendant

To Betty Frizelle, the Defendant

in said Cause:

You are hereby notified that T. C. Bethea, d/b/a Spanish Fort Septic

Tank Service

the Plaintiff in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama from ~~an appeal from the judgment rendered by~~

~~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 11 day of January 1972

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

Case No. 301

T. C. Bethea, d/b/a Spanish  
Fort Septic Tank Service

Plaintiff,

VS

Betty Frizelle

Defendant.

NOTICE OF ~~APPEAL~~ TRANSFER

Returnable To The Circuit Court of  
Baldwin County, Alabama

Issued: January 11, 1972

Serve On: Betty Frizelle  
c/o Calico Hill Stables  
Point Clear, Alabama

**JAN 13 1972**

TAYLOR WILKINS  
SHERIFF

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

**JAN 11 4 19 PM '72**

BY Taylor Wilkins

TAYLOR WILKINS, SHERIFF OF BALDWIN

COUNTY, ALABAMA, CLAIM \$1.50 EACH

FOR SERVING 1 PROCESS(S) AND 1

TRAVEL EXPENSE ON EACH OF \$ 1.50

PROCESS(S) OR A TOTAL OF \$ 1.50

Received 13 day of Jan. 19 72

and on 14 day of JAN. 19 72

I served a copy of the within Notice of Transfer

on Betty Frizelle

By service on Betty Frizelle

Taylor Wilkins

SHERIFF

BY Taylor Wilkins

D. S.