

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Zuline Hobbs 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 same, then and there to answer the complaint of Baldwin Furniture Company of Bay Minette, Inc., a Corporation.

Witness my hand this the 8 day of June, 1972.

Defendant may be found:  
Moran Street  
Bay Minette, Alabama

Eunice B. Blackmon  
Clerk

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BALDWIN FURNITURE COMPANY OF I IN THE CIRCUIT COURT OF  
BAY MINETTE, INC., a Corp.,

Plaintiff, I BALDWIN COUNTY, ALABAMA

Vs. I AT LAW 10,445

ZULINE HOBBS, I  
Defendant. I

I

The Plaintiff claims of the Defendant the sum of Five Hundred Sixty-five and 48/100 (\$565.48) Dollars, as balance due on a promissory note for \$753 made by her on the 23rd day of August, 1971 and payable on the 13th day of April, 1972 with interest thereon.

The note contains provision for a reasonable attorney's fee and waiver of exemption whereof Plaintiff claims benefit.

II

Plaintiff claims of the Defendant the sum of Fifty-five and 2/100 (\$55.02) Dollars, due from her by account on the 8th day of April, 1972 which sum of money with interest thereon, is still unpaid.

Plaintiff files by verified itemized statement of account which statement is attached hereto.

FILED

JUN 8 1972

Wilson Hayes  
Wilson Hayes  
Attorney for Plaintiff

EUNICE B. BLACKMON CIRCUIT CLERK

# 10,445<sup>0</sup>

Baldwin Furniture  
Co. of Bay Minette  
Inc.

vs:

Zaline Hobbs

FILED

JUN 8 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

JUN 8 1972

TAYLOR WILKINS

Wilson Hayes

Sheriff Claims

Ten Cents per mile Total \$

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Received day of

and on 9 day of

I served a copy of the writ on

on

By service on

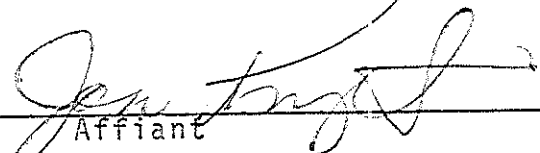
TAYLOR WILKINS, Sheriff

By W. B. Blackmon, S.

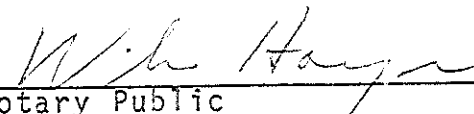
STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority appeared Jon Knight, who being known to me and being duly sworn, deposes and says that he is manager of Baldwin Furniture Company of Bay Minette, Inc., a Corporation organized in the State of Alabama and that he is familiar with the books and business of the said Baldwin Furniture Company of Bay Minette, Inc., a Corporation and that the attached account with Zuline Hobbs is just and correct, within the knowledge of this affiant and that the items thereon stated composing the said account are true and correct and that credit has been given for all payments and just and lawful offsets to which the said Zuline Hobbs is entitled and that the balance thereof, amounting to the sum of \$55.02, with interest thereon from the 8th day of April, 1972, is justly due and remains unpaid.

  
Affiant

Sworn to and subscribed before me this the 7<sup>th</sup> day  
of June, 1972.

  
Notary Public

RATING  
\$8.00 1 MO.  
8.21 1  
CREDIT LIMIT

BALDWIN FURNITURE CO.  
OF BAY MINETTE, INC.  
BAY MINETTE, ALABAMA  
SOLD TO WESTINGHOUSE CREDIT CORP.

Phone 937-7109

**GUNTER - DUNN, INC.**

Bay Minette, Alabama

**WHIRLPOOL — MAGIC CHEF**

N<sup>o</sup> 8608

**WORK ORDER**

Name

*Zulene Tables*

Date

*1-20-72*

Address

*Meran St*

Make

*Washer*

Model

*LV13 5300*

☒ In Warranty

☒ Out of Warranty

Purchased From

*Serial #*

*1090*

*7-13-70*

PARTS

*Replaced Mixer Valve Assembly*  
*15-LHF*

*8 46*

TAX

*43*

LABOR

*7 50*

TOTAL

*16 39*

Remarks or Report:

This Work Authorized By:

Customer's Signature

Phone 937-7109

**GUNTER - DUNN, INC.**

Bay Minette, Alabama

Nº 8726

**WHIRLPOOL — MAGIC CHEF**

**WORK ORDER**

Name Zulene Hobbs Date 3-7-72

Address Morgan St

Bay Minette Ala

Make Whirlpool Model WB5300

( ) In Warranty

(☒) Out of Warranty

Purchased From \_\_\_\_\_

PARTS

Timer Ass. BVJB

1 - 360974

29 64

TAX

1 49

LABOR

7 50

TOTAL

38 63

Remarks or Report:

This Work Authorized By: \_\_\_\_\_

Customer's Signature

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

June 26, 1973

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

Re: Baldwin Furniture Co. of Bay Minette  
v Zuline Hobbs, Case #10,445

Dear Mrs. Blackmon:

Please issue execution on the judgment in the  
above noted case.

Yours very truly,

*Wilson Hayes*  
Wilson Hayes

*Saved my letter to the Sheriff  
w/ the execution*  
WH/mm

BALDWIN FURNITURE COMPANY OF  
BAY MINETTE, INC., a Corporation

Plaintiff

-VS-

ZULINE HOBBS,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,445

ANSWER

Comes now the defendant in above styled cause and for answer  
to the complaint filed in this cause saith:

Not guilty.

  
ATTORNEY FOR DEFENDANT

CERTIFICATE OF MAILING

I certify that I have mailed a copy of the foregoing answer  
to Honorable Wilson Hayes, 108 Hoyle Avenue, Bay Minette, Alabama  
36507, by depositing the same in the United States Mail, postage  
prepaid, at Bay Minette, Alabama, on this the fourteenth day of  
July, 1972.

  
ATTORNEY FOR DEFENDANT

FILED

JUL 14 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK



BALDWIN FURNITURE COMPANY OF  
BAY MINETTE, INC., a Corporation,

Plaintiff

-VS-

ZULINE HOBBS,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,445

DEMURRER

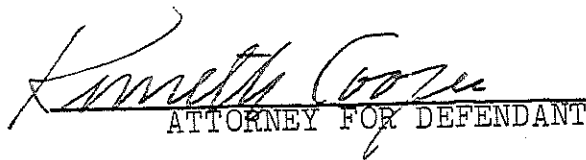
Comes now the defendant in above-styled cause and demurs to the complaint heretofore filed in this cause and assigns as grounds therefor the following, separately and severally, to each and every count thereof:

1. The complaint is vague.
2. The complaint is indefinite.
3. The complaint does not state a legal cause of action.
4. The complaint contains a claim for two separate claims, and it is not possible for the defendant to determine the exact amount claimed.

  
ATTORNEY FOR DEFENDANT

CERTIFICATE OF MAILING

I certify that I have mailed a copy of the foregoing Demurrer to Honorable Wilson Hayes, 108 Hoyle Avenue, Bay Minette, Alabama, by depositing the same in the United States mail, postage prepaid, at Bay Minette, Alabama, on this the sixteenth day of June, 1972.

  
ATTORNEY FOR DEFENDANT

FILED

JUN 16 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

CASE NO. 10,445

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BALDWIN FURNITURE COMPANY  
OF BAY MINETTE, INC., a  
Corporation,

Plaintiff

-VS-

ZULINE HOBBS,

Defendant

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

\* \* \* \* \*

ATTORNEY FOR DEFENDANT

KENNETH COOPER  
Post Office Box 1000  
Bay Minette, Alabama 36507  
Phone: 205 - 937-7412