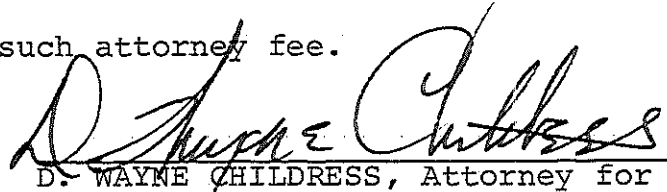


GENERAL DISCOUNT AND LOAN, INC.,)	IN THE CIRCUIT COURT OF
a Corporation,)	
)	BALDWIN COUNTY, ALABAMA
Plaintiff,)	
)	
vs.)	
)	AT LAW
EDDIE ANDERSON and MARY ANDERSON,)	
husband and wife, jointly and)	
individually,)	
)	
Defendants.)	CASE NO. <u>10,515</u>

C O M P L A I N T

Plaintiff claims of the Defendants the sum of ONE HUNDRED NINETY FOUR AND 70/100 (\$194.70) DOLLARS damages for the breach of an agreement entered into by them on the 28th day of September, 1970, with Allied Wholesale and Distributing Company, Inc., wherein the said Defendants purchased from Allied Wholesale and Distributing Company, Inc., a Capitol Sewing Machine for the amount of \$242.00 wherein the said Defendants paid the sum of \$8.00 and agreed to pay the balance of \$234.00 in eighteen (18) equal monthly installments of \$13.10 each, beginning on the 28th day of October, 1970 and continuing each and every month thereafter until paid. Plaintiff avers that said agreement was subsequently assigned to Plaintiff. Plaintiff avers that on to-wit, the 28th day of January, 1971, Defendants defaulted in the payment of said installment and pursuant to the terms of said agreement the entire balance due and owing became due and payable. Plaintiff avers that pursuant to the terms of said agreement Defendants agreed to pay a reasonable attorney's fee and Plaintiff claims the sum of Sixty Four and 90/100 (\$64.90) Dollars as such attorney fee.


 D. WAYNE CHILDRESS, Attorney for
 Plaintiff

Serve Defendant:

EDDIE ANDERSON
 806 Bibb Street
 Bay Minette, Alabama

MARY ANDERSON
 806 Bibb Street
 Bay Minette, Alabama

State of Alabama)
)
Baldwin County) TO THE SHERIFF OF BALDWIN COUNTY--GREETINGS

You are hereby commanded to summon EDDIE ANDERSON and MARY ANDERSON, 806 Bibb Street, Bay Minette, Alabama, 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 General Discount and Loan, Inc.

Witness my hand this 31 day of July, 1972.

Eunice B. Blackmon
CLERK, CIRCUIT COURT OF BALDWIN COUNTY

FILED

JUL 31 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

Received 27 day of July 1972
and on 1 day of August 1972
I served a copy of the within letter
on Eddie Anderson, Mary
Anderson

By service on _____

TAYLOR WILKINS Sheriff
[Signature]

Sheriff claims 8 miles at
Ten Cents per mile Total \$ 80
TAYLOR WILKINS, Sheriff
BY [Signature] DEPUTY SHERIFF

#10,515

GENERAL DISCOUNT AND LOAN, INC.
A CORPORATION,

VS:

EDDIE ANDERSON & MARY ANDERSON,
husband & wife, jointly & individually

RECEIVED

JUL 31 1972

TAYLOR WILKINS
SHERIFF

FILED

JUL 31 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

D. Wayne Childress
Attorney for Plaintiff

GENERAL DISCOUNT AND LOAN, INC.,
a Corporation,

Plaintiff,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

vs.

EDDIE ANDERSON and MARY ANDERSON,
husband and wife, jointly and
individually,

Defendants.

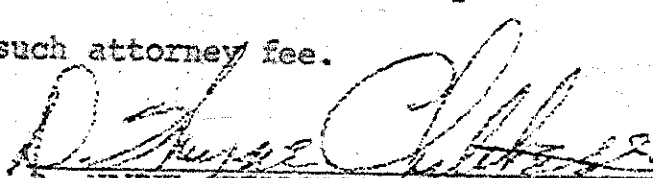
CASE NO. 10,515

C O M P L A I N T

Plaintiff claims of the Defendants the sum of ONE HUNDRED
an agreement entered into by them on the 28th day of September, 1970,
with Allied Wholesale and Distributing Company, Inc., wherein the
said Defendants purchased from Allied Wholesale and Distributing
Company, Inc., a Capitol Sewing Machine for the amount of \$242.00
wherein the said Defendants paid the sum of \$8.00 and agreed to pay
the balance of \$234.00 in eighteen (18) equal monthly installments
of \$13.10 each, beginning on the 28th day of October, 1970 and
continuing each and every month thereafter until paid. Plaintiff
avers that said agreement was subsequently assigned to Plaintiff.

Defendants defaulted on to-wit, the 28th day of January, 1971,
to the terms of said agreement the entire balance due and owing
became due and payable. Plaintiff avers that pursuant to the
terms of said agreement Defendants agreed to pay a reasonable

attorney's fee and Plaintiff claims the sum of Sixty Four and
90/100 (\$64.90) Dollars as such attorney fee.


D. WAYNE CHILDRESS, Attorney for
Plaintiff

Serve Defendant:

EDDIE ANDERSON
806 Bibb Street
Bay Minette, Alabama

MARY ANDERSON
806 Bibb Street
Bay Minette, Alabama

State of Alabama)

Baldwin County)

) TO THE SHERIFF OF BALDWIN COUNTY--GREETINGS

You are hereby commanded to summon EDDIE ANDERSON and MARY ANDERSON, 806 Bibb Street, Bay Minette, Alabama, 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 General Discount and Loan, Inc.

Witness my hand this 31 day of July, 1972.

Eunice B. Blackmon
CLERK, CIRCUIT COURT OF BALDWIN COUNTY

FILED

JUL 31 1972

EUNICE B. BLACKMON CLERK

GENERAL DISCOUNT AND LOAN, INC.,
a corporation,

Plaintiff

-VS-

EDDIE ANDERSON and MARY ANDERSON,
husband and wife, jointly and
individually,

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,515


ANSWER

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

1. Plaintiff ought not to recover in this cause because it
repossessed the property upon which this cause is based in 1970.
2. Not guilty.


ATTORNEY FOR DEFENDANTS

Defendants demand a
trial by jury.


ATTORNEY FOR DEFENDANTS

CERTIFICATE OF MAILING

I hereby certify that I have mailed a copy of the foregoing
answer to Honorable D. Wayne Childress, 201 North Conception,
Mobile, Alabama 36600, by depositing the same in the United States
Mail, postage prepaid, at Bay Minette, Alabama, on this the
thirtieth day of August, 1972.


ATTORNEY FOR DEFENDANTS

Attorney for Defendants:
Kenneth Cooper
Post Office Box 1000
Bay Minette, Alabama 36507

FILED
AUG 30 1972
EUNICE B. BLACKMON CIRCUIT
CLERK

LAW OFFICES
OF
W. BORDEN STRICKLAND
D. WAYNE CHILDRESS
201 N. CONCEPTION STREET
MOBILE, ALABAMA 36603
438-4788

July 28, 1972

Clerk of Register
Circuit Court - At Law
Baldwin County Court House
Bay Minette, Alabama

Re: General Discount vs. Richardson
and
General Discount vs. Anderson - 10,515

Gentlemen:

Enclosed are two complaints on the above-entitled cases.
Please file both and bill us for the court costs.

Very truly yours,

D. Wayne Childress
Per Mr. Childress

D. Wayne Childress

DWC:NhR
Enc.

LAW OFFICES
OF
W. BORDEN STRICKLAND
D. WAYNE CHILDRESS
201 N. CONCEPTION STREET
MOBILE, ALABAMA 36603
438-4788

April 6, 1973

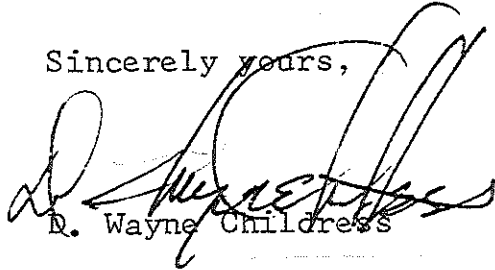
Mrs. Eunice B. Blackmon
Clerk of the Circuit Court
Baldwin County
Circuit Court House
100 Court House Square
Bay Minette, Alabama 36507

Re: General Discount & Loan vs. Eddie & Mary
Anderson, Case #10,515

Dear Mrs. Blackmon:

I note on the docket for April 11, 1973 that the above reference case is set. I wrote a letter to Judge Mashburn on February 13, 1973 requesting that a non-suit be entered and the cost bill sent to plaintiff. Would you check and see if this case has been non-suited and a cost bill prepared? Your attention to this matter will be greatly appreciated.

Sincerely yours,



D. Wayne Childress

DWC/cy

cc: Mr. Kenneth Cooper
109 East 1st Street
Bay Minette, Alabama 36507