

GENERAL DISCOUNT AND LOAN, INC.,) IN THE CIRCUIT COURT OF
a Corporation,) BALDWIN COUNTY, ALABAMA
Plaintiff,)
vs.) AT LAW
JIMMY RICHARDSON and ZELLAR)
RICHARDSON, husband and wife,)
jointly and individually,)
Defendants.) CASE NO. 10,516

COMPLAINT

Plaintiff claims of the Defendants the sum of THREE HUNDRED NINETY SIX AND NO/100 (\$396.00) DOLLARS damages for a breach of an agreement entered into by them on the 19th day of October, 1970, with Allied Wholesale and Distributing Company, Inc., wherein the said Defendants purchased from Allied Wholesale and Distributing Company, Inc., a Compact Stereo for the amount of \$535.80 wherein the said Defendants paid the sum of \$63.00 and agreed to pay the balance of \$472.80 in twenty-four (24) equal monthly payments of \$19.70 each, beginning on the 25th day of November, 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 25th day of February, 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 One Hundred Thirty Two and No/100 (\$132.00) Dollars as such attorney fee.


D. WAYNE CHILDRESS, Attorney for
Plaintiff

Serve Defendant:

JIMMY RICHARDSON
Route 1, Box 136-A
Loxley, Alabama 36551

ZELLAR RICHARDSON
Route 1, Box 136-A
Loxley, Alabama 36551

State of Alabama)

Baldwin County)

) TO THE SHERIFF OF BALDWIN COUNTY-GREETINGS

You are hereby commanded to summon JIMMY RICHARDSON and ZELLAR RICHARDSON, Route 1, Box 136-A, Loxley, Alabama 36551, 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 31 day of July 19 72
and on 2 day of August 19 72
I served a copy of the within By Jimmy Richardson
on Zellar Richardson
By service on _____

TAYLOR WILKINS, Sheriff
By H. H. Brown D. S.
40 mi RT
July

Sheriff claims 86 miles 8.02
Ten Cents per mile Total \$ 8.02
TAYLOR WILKINS, Sheriff
By Don DEPUTY SHERIFF

#10,516

GENERAL DISCOUNT AND LOAN, INC.,
A CORPORATION

VS:

JIMMY RICHARDSON & ZELLAR RICHARDSON,
husband and wife, jointly & individually,

RECEIVED

JUL 31 1972

TAYLOR WILKINS
CLERK

FILED

JUL 31 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

D. WAYNE CHILDRESS
201 N. Conception Street
Mobile, Alabama 36603
Attorney for Plaintiff

GENERAL DISCOUNT AND LOAN, INC.
a Corporation

PLAINTIFF

VS

JIMMY RICHARDSON and ZELLAR
RICHARDSON, husband and wife, jointly
and individually,

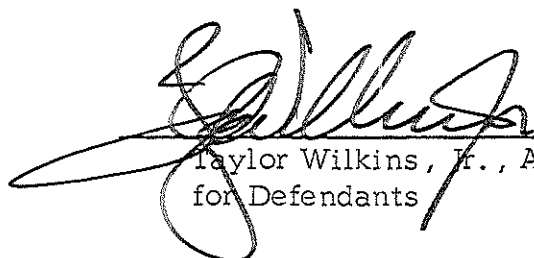
DEFENDANTS

(IN THE CIRCUIT COURT OF
(BALDWIN COUNTY, ALABAMA
(AT LAW
(
(
(
(CASE NO: 10,516
(

DEMURRER TO BILL OF COMPLAINT

Come now the Respondents, Jimmy Richardson and Zellar Richardson,
by their attorney, and demur to the original bill of complaint heretofore filed in
this cause and as grounds for such demurrer assign, separately and severally, the
following:

1. The Plaintiff has failed to state a cause of action against the
Defendants in its bill of complaint.

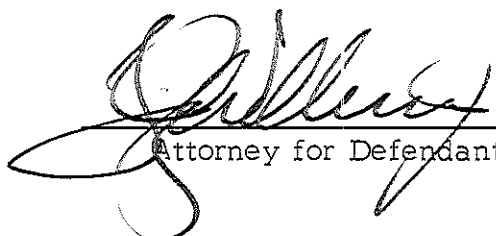

Taylor Wilkins, Jr., Attorney
for Defendants

I, the undersigned, Taylor Wilkins, Jr., do hereby certify that I have
on this the 3rd day of August, 1972, forwarded a true and exact copy of the
foregoing demurrer to Mr. D. Wayne Childress, Attorney at Law, Mobile, Alabama,
attorney of record for the Plaintiff, by mailing the same in the United States Post
Office, properly addressed, with the postage paid thereon.

FILED

AUG 8 1972

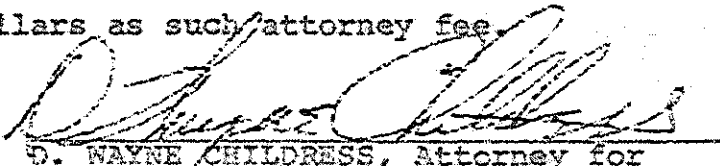
EUNICE B. BLACKMON CIRCUIT
CLERK


Attorney for Defendants

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D. WAYNE CHILDRESS, Attorney for
Plaintiff

Serve Defendant:

JIMMY RICHARDSON
Route 1, Box 136-A
Loxley, Alabama 36551

ZELLAR RICHARDSON
Route 1, Box 136-A
Loxley, Alabama 36551

State of Alabama

Baldwin County

)
)
) TO THE SHERIFF OF BALDWIN COUNTY-GREETINGS

You are hereby commanded to summon JIMMY RICHARDSON and
ZELLAR RICHARDSON, Route 1, Box 136-A, Loxley, Alabama 36551,
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
CIRCUIT COURT OF BALDWIN COUNTY

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

You are hereby commanded to summon JIMMY RICHARDSON and
WILLIAM RICHARDSON, Route 1, Box 188-A, Loxley, Alabama 36551,
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 21 day of July, 1971.

[Signature]
CLERK, CIRCUIT COURT OF BALDWIN COUNTY

#10,516

Extra copy

FILED

JUL 21 1971

CLERK OF CIRCUIT COURT