

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,563

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JAMES H. BOZEMAN

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint
filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

JAMES H. BOZEMAN Defendant.....

by

WRIGHT DISCOUNT CORPORATION, A CORPORATION Plaintiff.....

Witness my hand this 23 day of August 1972

Eugene B. Blackmon Clerk

No.

Page.

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

WRIGHT DISCOUNT CORPORATION,

a corporation

Plaintiffs

vs.

JAMES H. BOZEMAN

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

RICKARBY & BENTON
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route 1, Box 10
Stapleton, Alabama

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

WRIGHT DISCOUNT CORPORATION,
a corporation,

Plaintiff

vs.

JAMES HENRY BOZEMAN,

Defendant

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW


) CASE NO. 10,263

)

C O M P L A I N T

The plaintiff claims of the defendant FOUR HUNDRED FORTY-FIVE AND 50/100 DOLLARS (\$445.50) due by promissory note made by him on, to-wit, the 4th day of September, 1971, and payable on, to-wit, the 11th day of May, 1972, with interest thereon.

And the plaintiff avers that in said note and as a part of the consideration thereof, the defendant has expressly waived his rights to claim personal property as exempt to him under the constitution and laws of the State of Alabama or any other state, and the plaintiff further avers that in said note and as a part of the consideration thereof, the defendant has agreed to pay a reasonable attorney's fee for the collection thereof, and the plaintiff hereby claims the further sum of SIXTY-SIX AND 75/100 DOLLARS (\$66.75) as such attorney's fee.


DANIEL A. BENTON, Attorney for Plaintiff

FILED

AUG 23 1972

EUNICE B. BLACKMON CIRCUIT CLERK

Defendant can be served at
his residence at

Route 1, Box 10
Stapleton, Alabama

WRIGHT DISCOUNT CORPORATION,
a corporation,

Plaintiff

vs.

JAMES HENRY BOZEMAN,

Defendant

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW

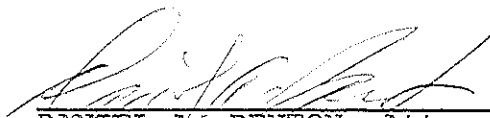
) CASE NO. 10,563

)

C O M P L A I N T

The plaintiff claims of the defendant FOUR HUNDRED FORTY-FIVE AND 50/100 DOLLARS (\$445.50) due by promissory note made by him on, to-wit, the 4th day of September, 1971, and payable on, to-wit, the 11th day of May, 1972, with interest thereon.

And the plaintiff avers that in said note and as a part of the consideration thereof, the defendant has expressly waived his rights to claim personal property as exempt to him under the constitution and laws of the State of Alabama or any other state, and the plaintiff further avers that in said note and as a part of the consideration thereof, the defendant has agreed to pay a reasonable attorney's fee for the collection thereof, and the plaintiff hereby claims the further sum of SIXTY-SIX AND 75/100 DOLLARS (\$66.75) as such attorney's fee.



DANIEL A. BENTON, Attorney for Plaintiff

FILED

AUG 23 1972

EUNICE B. BLACKMON
CIRCUIT CLERK

This Instrument Was
Prepared By
DANIEL A. BENTON
Attorney At Law
Box 471
Fairhope, Ala. 36532

Defendant can be served at
his residence at

Route 1, Box 10
Stapleton, Alabama

AFFIDAVIT

STATE OF ALABAMA

COUNTY OF MOBILE

Before me, the undersigned authority, personally appeared J. D. WRIGHT who, known to me and being by me first duly sworn, deposes on oath and says that he is the duly authorized representative of WRIGHT DISCOUNT CORPORATION, Plaintiff in the attached lawsuit; that to the best of his knowledge, information and belief, the contract which is the basis of said lawsuit was executed pursuant to the provisions of Act No. 2052 of the Legislature of the State of Alabama, 1971, and that there have been no violations of said Act; and that the Defendant (s) in said lawsuit is a non-resident of Mobile County, Alabama.

J. D. Wright

SWORN TO AND SUBSCRIBED BEFORE ME

ON THIS 31st DAY OF July, 1972.

C. J. Camell
Notary Public, ~~XXXXXXXXXXXXXXXXXXXX~~ at Large

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonJAMES H. BOZEMAN.....

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint

filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

.....JAMES H. BOZEMAN....., Defendant.....

by

WRIGHT DISCOUNT CORPORATION, A CORPORATION

....., Plaintiff.....

Witness my hand this.....23.....day of.....August.....1972.....

.....Eunice B. Blackmon.....Clerk

No. 11,563

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

WRIGHT DISCOUNT CORPORATION,

a corporation

Plaintiffs

vs.

JAMES H. BOZEMAN

Defendants

SUMMONS AND COMPLAINT

Filed **FILED** 19.....

AUG 23 1972

Clerk

EUNICE B. BLACKMON **CIRCUIT CLERK**

RICKARBY & BENTON
Fairhope, Alabama

RECEIVED

Plaintiff's Attorney

AUG 23 1972

TAYLOR WILKINS
Defendant's Attorney

Defendant lives at

Route 1, Box 10
Stapleton, Alabama

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

James H. Bozeman

Returned 24 day of Aug 1972
Not found in my county after diligent search and I
swear

Taylor Wilkins, Sheriff

By *W. A. Zolner*
TAYLOR WILKINS, SHERIFF OF ~~County~~ Sheriff

COUNTY, ALABAMA, CLAIM \$1.50 EACH

FOR SERVING _____ PROCESS(ES) AND

TRAVEL EXPENSE ON EACH OF \$ _____

PROCESS(ES) OR A TOTAL OF \$ _____

Sheriff

Deputy Sheriff

E. G. RICKARBY
DANIEL A. BENTON
TELEPHONE
(205) 928-2308

LAW OFFICES
RICKARBY & BENTON
ATTORNEYS AT LAW
316 MAGNOLIA AVENUE
P. O. BOX 471
FAIRHOPE, ALABAMA 36532

DAPHNE BRANCH
EARLE REALTY BUILDING
HIGHWAY 98
TELEPHONE
(205) 626-2608

February 28, 1973

Honorable Telfair J. Mashburn
Judge of the Circuit Court
Bay Minette, Alabama 36507

Re: Wright Discount v. James H. Bozeman
Case No. 10,563, at Law

Dear Judge Mashburn:

Service of process has not been obtained in the above-styled matter, and I, therefore, respectfully request that this case be continued for one term of Court while we seek to locate the defendant.

Respectfully submitted,


Daniel A. Benton

DAB:w

cc-Mrs. Eunice Blackmon
Clerk of the Circuit Court
cc-Wright Discount Corporation

E. G. RICKARBY
DANIEL A. BENTON
TELEPHONE
(205) 928-2308

LAW OFFICES
RICKARBY & BENTON
ATTORNEYS AT LAW
316 MAGNOLIA AVENUE
P. O. BOX 471
FAIRHOPE, ALABAMA 36532

DAPHNE BRANCH
EARLE REALTY BUILDING
HIGHWAY 98
TELEPHONE
(205) 626-2608

June 7, 1973

Honorable Telfair J. Mashburn
Judge of the Circuit Court of
Baldwin County, Alabama
Bay Minette, Alabama 36507

Re: Wright Discount Corporation
v. James H. Bozeman
Case No. 10,563, at Law

Dear Judge Mashburn:

This case was filed in August of 1972 and we have been unable to obtain service of process on the defendant. I therefore request that this case be dismissed.

Respectfully submitted,


Daniel A. Benton

DAB:w
cc-Clerk of the Circuit Court
cc-Wright Discount Corporation