

L - THE LIVERPOOL & LONDON & GLOBE INSURANCE COMPANY LTD.
N - NEWARK INSURANCE COMPANY
Q - QUEEN INSURANCE COMPANY OF AMERICA
R - ROYAL INDEMNITY COMPANY
T - THAMES & MERSEY MARINE INSURANCE CO. LTD.
W - ROYAL INSURANCE COMPANY LTD

FILED

METROPOLITAN ACCOUNTS & COLLECTION

SEP 8 1972

EUNICE B. BLACKMON CIRCUIT CLERK

(Date)

(Producer Code)

FOLD

FOLD

[illegible]

COMPLAINT AND SUMMONS

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

} TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon Albert H. Knowles, 519 Byrne Street, Bay
Minette, Alabama 36507to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile
County, on the 5 day of September, 1972 at the hour of 9:00 A.M.,
then and there to answer a complaint of Royal Indemnity Company

of a debt or other demand not exceeding Fifteen Hundred Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this _____ day of JUL 27 1972Joseph W. Chambers
Clerk of the Court of General Sessions of Mobile County.Cause of Action _____
CAUSE OF ACTION: Plaintiff claims of Defendant (a) \$ 210.00
due from Defendant by account on, to wit: 6-30-72
which sum of money, with interest thereon, is still due and unpaid. This
suit is filed on an itemized statement of the account, verified by the
affidavit of a competent witness, which is attached to the original complaint
and made a part hereof.Herbert P. Feibelman, Jr.
HERBERT P. FEIBELMAN, JR. Atty. for Plaintiff

COMPLAINT AND SUMMONS

Atty. for Plaintiff: FEIBELMAN & SILVER

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS
OF MOBILE COUNTY

No. 8188

Ret.

September 5, 1972

ROYAL INDEMNITY COMPANY

VS.

ALBERT H. KNOWLES

519 Byrne Street

Bay Minette, 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

2

The State of Alabama,
MOBILE COUNTY }

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

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Minette, Alabama 36507to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile
County, on the 5 day of September, 1972 at the hour of 9:00 A.M.,
then and there to answer a complaint of Royal Indemnity Company

of a debt or other demand not exceeding Fifteen Hundred Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this _____ day of _____

JUL 27 1972

19____.

[Signature]
Clerk of the Court of General Sessions of Mobile County.CAUSE OF ACTION: Plaintiff's claim of Defendant (a) \$ 211.00
due from Defendant by account on, to-wit: 6-30-72
which sum of money, with interest thereon, is still due and unpaid. This
suit is filed on an itemized statement of the account, verified by the
affidavit of a competent witness, which is attached to the original complaint
and made a part hereof.[Signature]
HERBERT P. FEIBELMAN, JR. Atty. for Plaintiff

COMPLAINT AND SUMMONS

Atty. for Plaintiff: FEIDELMAN & SILVER

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS
OF MOBILE COUNTY

No. 8188

Ret.

September 5, 1972

ROYAL INDEMNITY COMPANY

VS.

ALBERT H. KNOWLES

519 Byrne Street

Bay Minette, Alabama

Bald
Ca

Continued To

RECEIVED

AUG 1 1972

TAYLOR WILKINS
SHERIFF

Executed by Service on

Albert H. Knowles
Defendant

This 24 day Aug, 1972

Baldwin
Sheriff of Mobile County

By W. A. Talbert

Deputy Sheriff

REC'D SHERIFF DEP
MOBILE COUNTY, ALA

JUL 27 4 28 PM '77

BY

TAYLOR WILKINS, SHERIFF OF BALDWIN

COUNTY, ALABAMA, CLAIM \$100.00

FOR SERVING 1 PROCESS

TRAVEL EXPENSE ON EACH OF 1

PROCESS(ES) OR A TOTAL OF \$ 1.50

3

ROYAL INDEMNITY COMPANY	*	IN THE COURT OF GENERAL
Plaintiff	*	SESSIONS OF MOBILE COUNTY
vs	*	AT LAW
ALBERT H. KNOWLES	*	CASE NO. 8188
Defendant	*	

Comes the Defendant in the above entitled cause, appearing specially and only for the purpose of filing this plea, and says that the said Royal Indemnity Company, Plaintiff in this cause, ought not to have and maintain its said action for the Defendant says, separately and severally, as follows, to-wit:

-1-

That the said Defendant is a resident of Baldwin County, Alabama, as shown on the Summons and Complaint; and that further, the said Defendant was a permanent resident of Baldwin County, Alabama, when the alleged cause of action arose.

-2-

That the said action is based on an alleged account.

WHEREFORE, Defendant says that the Court of General Sessions of Mobile County, Alabama, is without jurisdiction to try and determine this cause, and that this said action should be abated, and prays the judgment of this Honorable Court whether the Plaintiff should be allowed to further maintain this suit.

Albert H. Knowles
ALBERT H. KNOWLES

STATE OF ALABAMA
BALDWIN COUNTY

Before me, C. LeNoir Thompson, a Notary Public in and for said County and State, personally appeared Albert H. Knowles, who being known to me and by me first duly sworn, deposes and says as follows: That he is the defendant in the foregoing cause, and that the facts stated in said cause are true and correct.

Albert H. Knowles
ALBERT H. KNOWLES

COURT OF GENERAL
SESSION

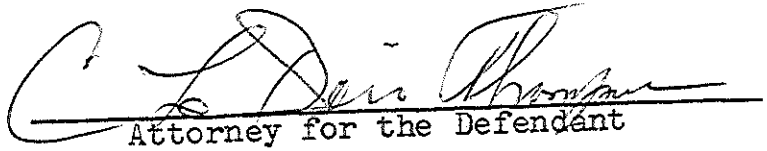
Sworn to and subscribed before me on this 2nd day of September, 1972. 45 AM '72

C. LeNoir Thompson
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

CERTIFICATE

I, C. LeNoir Thompson, Attorney for the Defendant in this cause, do hereby certify that I have this day mailed a copy of the foregoing Plea to the Venue to Honorable Herbert P. Feibelman, Jr., Attorney at Law, First National Bank Building, Mobile, Alabama, by depositing a copy of same in the United States Mail, postage prepaid.

Done this 27th day of September, 1972.


Attorney for the Defendant

THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

ROYAL INDEMNITY COMPANY	:	Filed:	Case No.: 8188
	:		
PLAINTIFF,	:	Summons Issued:	July 26, 1972
	:		
VS	:	Returnable:	July 27, 1972
	:		
ALBERT H. KNOWLES	:	Service Had:	September 5, 1972
	:		
DEFENDANT	:	Cause of Action:	August 24, 1972
	:		
	:	Attorney for Plaintiff:	IVA
	:		
	:	Attorney for Defendant:	Feibelman & Silver
	:		
	:	Amount of Claim:	LeNora Thompson
	:		
	:		\$210.00

9-5-72: Plea in Abatement Filed

9-5-72: Plea Confessed - Cause Transferred to Circuit Court, Bay Minette, Alabama, Baldwin County.

Paul W. Chambers

I hereby certify that the foregoing is a true and correct copy of the above styled cause, as it appears on record and in the files of The Court of General Sessions of Mobile County, Alabama.

Witness my hand this the 7 day of September, 1972.

Doyle W. Chambers

Clerk of The Court of General Sessions of Mobile County, Alabama

COST BILL*Leibelman & Albel 5*
ATTORNEYS FOR PLTF:—

General Sessions (Civil Div.) Court of Mobile, Mobile County Court House, Mobile, Ala.

Royal Indemnity Company
Plaintiff*Albert H. Knowles*
DefendantCASE NO. *8188*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

Levyng 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	
FAIR TRIAL TAX	2.00

TOTAL \$**GRAND TOTAL** \$ *11.50*

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.

Doyle Chambers, Clerk

NOTICE of

STATE OF ALABAMA,)
MOBILE COUNTY)

Royal Indemnity Company

Plaintiff

VS.

Albert H. Knowles

Defendant

To Albert H. Knowles, the defendant

in said Cause:

You are hereby notified that Royal Indemnity Company

the Plaintiff in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama from 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 7 day of September 1972

Doyle W. Chambers
Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 8188

Royal Indemnity Company

Plaintiff,

VS

Albert H. Knowles

Defendant.

NOTICE OF ~~APPEAL~~ TRANSFER

Returnable To The Circuit Court of
Baldwin County

Issued: September 7, 1972

Serve On: Albert H. Knowles
519 Byrne Street
Bay Minette, Alabama

NOTICE of ~~XXXXXXXXXXXXXXXXXX~~ ~~XXXXXXXXXXXXXXXXXX~~

STATE OF ALABAMA,)
MOBILE COUNTY)

Royal Indemnity Company

Plaintiff

VS.

Albert H. Knowles

Defendant

To **Albert H. Knowles, the defendant**

in said Cause:

You are hereby notified that **Royal Indemnity Company**

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 therein rendered by~~ the ~~judge of~~ **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 Mobile** County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the **7** day of **September** 19**72**

Doyle W. Chambers
Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 8188

Royal Indemnity Company

Plaintiff,

VS

Albert H. Knowles

Defendant.

NOTICE OF ~~XXXXX~~ TRANSFER

Returnable To The Circuit Court of
Baldwin County

Issued: September 7, 1972

Serve On: Albert H. Knowles
519 Byrne Street
Bay Minette, Alabama

RECEIVED

SEP 11 1972

TAYLOR WILKINS
SHERIFF

Received 14 day of Sept 1972
and on 12 day of Sept 1972
I served a copy of the within Writ of Habeas Corpus
on Albert H. Knowles for serving 1 process.
TRAVEL EXPENSE ON EACH OF _____
PROCESS[ES] OR A TOTAL OF \$ 1.50

RECEIVED SHERIFF DEPT.
MOBILE COUNTY, ALA.

SEP 8 8 59 AM '72

BY: _____

TAYLOR WILKINS, Sheriff
W. A. Walker

FEIBELMAN & SILVER

ATTORNEYS AT LAW

2103 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA 36601

HERBERT P. FEIBELMAN, JR.

IRVING SILVER

IRVIN GROSSKY

P. O. BOX 2062

TELEPHONE 205 433-1597

JUDICIAL ACTION REQUEST

July 20, 1973

Date

TO: _____ Clerk, Court of General Sessions of Mobile County, Alabama
_____ Clerk, Circuit Court of Mobile County, Alabama
_____ Sheriff's Department of Mobile County, Alabama
X _____ (Other) Circuit Court of Baldwin County

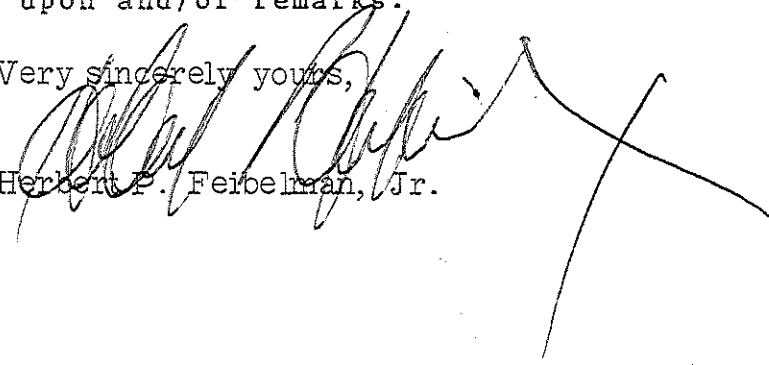
Re: Royal Indemnity Co. vs. Albert H. Knowles
Case No. 10, 599

TO THE ABOVE NAMED OFFICIAL:

Please take the below indicated action regarding this case:

1. _____ Issue an _____ alias _____ pluries complaint and summons at the address shown in No. 10 below.
2. _____ Issue a Writ of Discovery commanding the Defendant to file in court a sworn list of its assets, if any.
3. _____ Discharge the garnishee in the above styled cause.
4. _____ Send a notice of the garnishment release to the garnishee. For your convenience, a stamped, pre-addressed envelope is enclosed.
5. _____ Issue an _____ execution _____ alias execution against the Defendant (Garnishee) in the above styled cause giving credit for payment of \$ _____ and hand the execution to the Sheriff with this letter so that he may levy on the property described below and at the address in No. 10 below.
6. X _____ Dismiss the above case on motion of the Plaintiff.
7. _____ Nonsuit the above case on motion of the Plaintiff.
8. _____ Send us a certificate of the judgment in the above case, and enclosed find our check in the amount of \$ _____.
9. _____ Record a certificate of judgment in the above case and find enclosed our check in the amount of \$2.00.
10. _____ Levy on the property of the Defendant(s) described in No. 11 at this address:
11. _____ Property to be levied upon and/or remarks:

Very sincerely yours,


Herbert P. Feibelman, Jr.

HPF/mp

cc: Mr. C. LeNoir Thompson