

| | | |
|------------------------------------|---|-------------------------|
| MERCHANTS ADJUSTMENT SERVICE, INC. |) | IN THE CIRCUIT COURT OF |
| |) | |
| Plaintiff |) | BALDWIN COUNTY, ALABAMA |
| |) | |
| VS |) | |
| |) | AT LAW |
| MICKEY ALLEN AND CAROLYN ALLEN, |) | |
| Jointly and Individually |) | |
| |) | |
| Defendants |) | CASE NO. <u>10,680</u> |

Plaintiff claims of the defendants, jointly and individually, THREE HUNDRED FIFTY-TWO and 20/100 (\$352.20) DOLLARS, due from them by account in October, 1970, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized verified account, which will be offered in evidence at trial.

William L. Howell
 WILLIAM L. HOWELL
 Attorney for Plaintiff
 2204 First National Bank Bldg.
 Mobile, Alabama 36602

Serve the defendants at:

Box 107 Robertsdale, Ala. or
 c/o Sanders Construction Co.
 Robertsdale, Ala.

STATE OF ALABAMA)
)
 BALDWIN COUNTY)

TO ANY SHERIFF IN THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Mickey Allen and Carolyn Allen Jointly and Individually, TO appear in the Circuit Court of Baldwin County, Alabama, within 30 days from the service of this writ, at the place of holding the same, then and there to answer the annexed complaint of Merchants Adjustment Service, Inc.

Witness my hand as Clerk, this 31 day of Oct, 1972.

FILED

OCT 31 1972

Junice B. Blackmon
 CLERK

JUNICE B. BLACKMON CLERK

STATEMENT OF ACCOUNT

Creditor Merchants Adj. Soc. Assignee of Bay Medical, Dr. Jones & Henry Hospital
Debtor Allen, Mackay & Company Address Box 102, Robertsdale, Ala.
Employment Hk. Sanders Const. Co. Address Robertsdale, Ala.

Professional Services Rendered On Account \$ 352.20

Merchandise, Goods, Sold and Delivered On Account \$ _____

Date of Last Charge 10/70

Date of Last Payment 7/71

SWORN STATEMENT OF CLAIM

STATE OF ALABAMA

COUNTY OF MOBILE

I hereby certify that the above account is just and correct and that all proper credits have been given and that the balance as indicated above is due and payable.

X

Manna T. Jones

Affiant

Sworn and subscribed to before me this

27th day of Oct. 19 72

B. E. Savage
Notary Public

STATE OF ALABAMA
COUNTY OF MOBILE

FOR A CONSIDERATION OF One and No/100 (\$1.00) Dollars and other valuable considerations to

Bay Medical Clinic

hereinafter called Vendor, paid by Merchants Adjustment Service, Inc. hereinafter called Vendee, the receipt of which is hereby acknowledged, and a further valuable consideration to be paid by Vendee to Vendor does hereby Sell, Assign, Transfer and set over to the Merchants Adjustment Service, Inc. of Mobile, Alabama, the following accounts:

Carolyn & Mickey C. Allen

221 09
~~221 09~~

with full right and authority to demand, collect and receive payment thereof, and to execute any and all necessary receipts and releases thereof, with full right to enforce said claims by suit in the name of the Vendor or in the name of the said Vendee, but at the cost and expense of the Vendee. The Vendor warrants the said claims to be just, correct, due and owing and free from set-offs or counter-claims, and agrees to furnish on demand of the Vendee, all necessary statements, evidence and proof to support said claims.

Because of the uncertainty of the value of the said accounts, the exact consideration for this assignment is to be determined in accordance with an existing contract between Vendor and Vendee. However, it is expressly understood that Vendor hereby conveys to Vendee the absolute title to said accounts and the Vendor retains no title or interest, legal or equitable, in or to said accounts, or any proceeds that Vendee may obtain therefrom.

Executed on this the 27th day of Oct., 19 72

W. W. L. L. L.

STATE OF ALABAMA
COUNTY OF MOBILE

FOR A CONSIDERATION OF One and No/100 (\$1.00) Dollars and other valuable considerations to

Dr. O.O. Jones

hereinafter called Vendor, paid by Merchants Adjustment Service, Inc. hereinafter called Vendee, the receipt of which is hereby acknowledged, and a further valuable consideration to be paid by Vendee to Vendor does hereby Sell, Assign, Transfer and set over to the Merchants Adjustment Service, Inc. of Mobile, Alabama, the following accounts:

Mickey Allen & Carolyn \$101.00

with full right and authority to demand, collect and receive payment thereof, and to execute any and all necessary receipts and releases thereof, with full right to enforce said claims by suit in the name of the Vendor or in the name of the said Vendee, but at the cost and expense of the Vendee. The Vendor warrants the said claims to be just, correct, due and owing and free from set-offs or counter-claims, and agrees to furnish on demand of the Vendee, all necessary statements, evidence and proof to support said claims.

Because of the uncertainty of the value of the said accounts, the exact consideration for this assignment is to be determined in accordance with an existing contract between Vendor and Vendee. However, it is expressly understood that Vendor hereby conveys to Vendee the absolute title to said accounts and the Vendor retains no title or interest, legal or equitable, in or to said accounts, or any proceeds that Vendee may obtain therefrom.

Executed on this the 27th day of Oct, 19 72

O.O. Jones

STATE OF ALABAMA
COUNTY OF MOBILE

FOR A CONSIDERATION OF One and No/100 (\$1.00) Dollars and other valuable considerations to

Thomas Hospital

hereinafter called Vendor, paid by Merchants Adjustment Service, Inc. hereinafter called Vendee, the receipt of which is hereby acknowledged, and a further valuable consideration to be paid by Vendee to Vendor does hereby Sell, Assign, Transfer and set over to the Merchants Adjustment Service, Inc. of Mobile, Alabama, the following accounts:

Mickey C. Allan *x Carolyn* \$30.20

with full right and authority to demand, collect and receive payment thereof, and to execute any and all necessary receipts and releases thereof, with full right to enforce said claims by suit in the name of the Vendor or in the name of the said Vendee, but at the cost and expense of the Vendee. The Vendor warrants the said claims to be just, correct, due and owing and free from set-offs or counter-claims, and agrees to furnish on demand of the Vendee, all necessary statements, evidence and proof to support said claims.

Because of the uncertainty of the value of the said accounts, the exact consideration for this assignment is to be determined in accordance with an existing contract between Vendor and Vendee. However, it is expressly understood that Vendor hereby conveys to Vendee the absolute title to said accounts and the Vendor retains no title or interest, legal or equitable, in or to said accounts, or any proceeds that Vendee may obtain therefrom.

Executed on this the 20TH day of OCTOBER, 19 72

Carolyn
For: Thomas Hospital

10,680

Y

B-14

Merchants Adjustment
Service Inc.

vs.

Mickey Allen & Carolyn
Allen, Jointly & Individually

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIMS ~~AGAINST EACH~~

FOR SERVING 2 ~~PROCESS[ES]~~ AND

TRAVEL EXPENSE ON EACH OF \$ 100.00

PROCESS[ES] OR A TOTAL OF \$ 10.00

Received 13 day of Nov. 19 72
I served a copy of the within file
on Mickey Allen
Carolyn Allen
By Taylor Wilkins Sheriff
R-Rate

FILED

OCT 31 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

RECEIVED

OCT 31 1972

TAYLOR WILKINS
SHERIFF

Wm L. Howell

WILLIAM L. HOWELL

Attorney at Law

SUITE 2204
FIRST NATIONAL BANK BLDG.
MOBILE, ALABAMA 36602

October 30, 1972

TELEPHONE
AREA CODE 205
438-2516

Mrs. Eunice B. Blackmon
Clerk of Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

10,680

Re: Merchants Adjustment Service, Inc. vs Mickey Allen and
Carolyn Allen

Dear Mrs. Blackmon:

Please advise me at your earliest convenience as to the case
number and the date of service of process on the above
styled matter.

Thanking you in advance for your cooperation, and with warmest
personal regards, I am,

Very truly yours,


William L. Howell

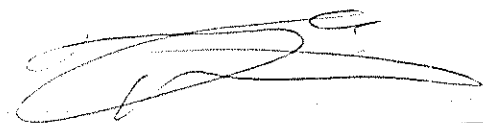
WLH:gd

Encl:

MERCHANTS ADJUSTMENT SERVICE, § IN THE CIRCUIT COURT
INC., § OF BALDWIN COUNTY,
Plaintiff, § ALABAMA
VS. § AT LAW
MICKEY ALLEN and CAROLYN
ALLEN, jointly and individually §
Defendants. § CASE NO. 10,680

Comes now the Defendant, MICKEY ALLEN, and says and shows unto this Honorable Court that on, to-wit, October 30, 1972, he filed a proceeding in the United States District Court for the Southern District of Alabama under the National Bankruptcy Act, Chapter XIII, and moves that this cause be abated and all proceedings stayed pending said cause.

DONALD A. FRIEDLANDER



Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 27th day of November, 19 72 served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.


DONALD A. FRIEDLANDER

FILED

NOV 28 1972

EUNICE B. BLACKMON CLERK