

Auto Outlet, Inc.
A Corporation

Plaintiff

Vs

William D. Parker

Defendant


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In the Circuit Court of
Baldwin County, Alabama
At Law, No. 2276

Now comes the Defendant by his Attorney and for answer to
the complaint says;

1.

The allegations contained in the complaint are untrue.


Attorney for the Defendant

Defendant demands a trial by jury.

FILED

June 14, 1954
ALICE J. DICK, Clerk


Attorney for the Defendant

AUTO OUTLET, INC., a	:	IN THE CIRCUIT COURT OF
corporation,	:	
	:	BALDWIN COUNTY, ALABAMA
Plaintiff,	:	
	:	AT LAW
Vs.	:	
	:	
WILLIAM D. PARKER,	:	
	:	
Defendant.	:	NO. _____

Plaintiff claims of the Defendant the sum of, to-wit, THREE HUNDRED EIGHTY-TWO AND 28/100 (\$382.28) DOLLARS, damages, for the breach of a written agreement entered into by the Defendant on, to-wit, the 5th day of September, 1953, whereby the Defendant promised to pay to the Plaintiff the sum of FOUR HUNDRED EIGHTY-SEVEN AND 86/100 (\$487.86) DOLLARS, payable as follows: Thirty-five and no/100 (\$35.00) Dollars on the 5th day of October, 1953, and the sum of Thirty-five and no/100 (\$35.00) Dollars on the 5th day of each successive month thereafter up to and including the 5th day of August, 1954, and a final payment of ONE HUNDRED TWO AND 86/100 (\$102.86) DOLLARS on the 5th day of September, 1954; for the purchase of an automobile. Said written instrument provided that in the event of a default in said payment the entire amount would become due and the Plaintiff could seize said automobile and sell same at a public or private sale, with or without advertisement, with or without notice to the Defendant, and apply the proceeds of said sale to the remainder due under the said written instrument, and in the event of a deficiency the Defendant agreed to pay the amount of the deficiency.

Plaintiff alleges that the Defendant defaulted in said written instrument in that he failed to make the payments provided for therein, leaving a balance of principal due, of, to-wit, FOUR HUNDRED TWENTY-SEVEN and 28/100 (\$427.28) DOLLARS; that the automobile mentioned therein was seized and sold for the net sum of Forty-five and no/100 (\$45.00) Dollars, which sum the Plaintiff alleges was

the reasonable market value of the automobile at the time of the seizure and that after applying the amount received from the sale of the said automobile to the balance due under the said written instrument, a balance of THREE HUNDRED EIGHTY-TWO AND 28/100 (\$382.28) DOLLARS remains due and unpaid.

Plaintiff claims the benefit of a waiver of personal property exemption contained in said instrument.

Plaintiff claims the additional sum of Seventy-six and 53/100 (\$76.53) Dollars as a reasonable attorney's fee, averring that Seventy-six and 53/100 (\$76.53) Dollars is a reasonable attorney's fee as is provided for in said written instrument.

Joseph M. Hockland
Attorney for Plaintiff

Defendant's Address:

Route 2, Box 60
Bay Minette, Alabama
or can be served

Brookley Air Force Base
Brookley Field, Alabama

FILED

5-25-54

ALICE L. DICK, Clerk

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 2276

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon William D. Parker

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

William D. Parker

, Defendant

by Auto Outlet, Inc. A Corp

, Plaintiff

Witness my hand this 25th day of May 1954

, Clerk

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No. 2276 Page

The State of Alabama
Baldwin County

CIRCUIT COURT

AUTO OUTLET, Inc. A Corp

Plaintiffs

vs.

WILLIAM D. PARKER

~~WILLIAM D. PARKER~~

Defendants

Summons and Complaint

Filed 5-25-54 19

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

May 25 1954
Taylor Wilkin Sheriff

I have executed this summons

this 6/2 1954

by leaving a copy with

William D Parker

Taylor Wilkin Sheriff
Pat Selles Deputy Sheriff