

E. G. RICKARBY

392 FAIRHOPE AVENUE

FAIRHOPE, ALABAMA

September 10, 1960

3969

Honorable Hubert M. Hall
Judge of Circuit Court
Bay Minette, Alabama

Dear Judge Hall:

RE: Universal C. I. T.
vs Jessie Sullivan
Our File: 4912

Mrs. Sullivan is ill as you will see by the enclosed medical certificate. I have taken this matter up with Mr. John Duck who agrees that the case can be taken out of the call with your consent.

Yours very truly,



EGR/wr

Enc:

cc: Mr. John V. Duck

9/13/60

I hereby consent that
the above case be continued.



THE JORDAN CLINIC AND HOSPITAL

25 NORTH SECTION STREET

FAIRHOPE, ALABAMA

September 2, 1960

Mr. E.G. Rickarby
Fairhope
Alabama

Dear Sir:

Mrs. Daniel (Jessie) Sullivan, underwent major surgery August 29. She is convalescing satisfactorily in the hospital at Fairhope, Alabama, but will be unable to travel thirty five miles and attend court for an indefinite period of time.

Very truly yours

R.H. Johnson, M.D.

R.H. Johnson, M.D.

RHJ/ew

TELEPHONE WA 8-9836

LAW OFFICES
E. G. RICKARBY
392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

P. O. BOX 71

October 23, 1959

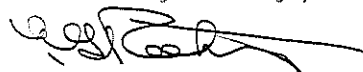
Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Universal C.I.T. Credit Corp.
Vs: Jessie L. Sullivan

With this we are handing you Pleas in the above styled
cause. Please file and oblige.

Yours very truly,



EGR/bs
Enclosure
cc: John Duck

UNIVERSAL C.I.T. CREDIT
CORPORATION, a corporation,

Plaintiff

-VS-

JESSIE L. SULLIVAN

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

COUNT ONE:

Plaintiff claims of the Defendant the sum of ONE THOUSAND SIXTY SEVEN and no/100 (\$1,067.00) Dollars, damages, for the breach of a written contract entered into by the Defendant on to-wit: the 18th day of September, 1957, by which she promised to pay to Gaston Motor Co. Inc., the sum of EIGHTY SEVEN and 05/100 (\$87.05) dollars, commencing on to-wit, the 18th day of October, 1957, for thirty consecutive months, for the full purchase price of an automobile; said written instrument provided that in the event of a default in said payment, the entire amount would then become due, and the plaintiff could seize said automobile and sell the 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 avers that said written instrument, together with all rights thereunder was assigned to it by the said Gaston Motor Co. Inc., before default in said written instrument, for which a valuable consideration has been paid.

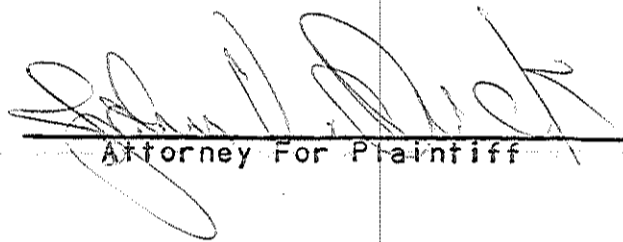
Plaintiff further alleges that the defendant defaulted in said written instrument and in that she failed to make the payments provided for therein, leaving a balance of principal due of TWO THOUSAND NINETEEN and 15/100 (\$2,019.15) dollars; that the automobile mentioned therein was seized and sold for the sum of ONE THOUSAND (\$1,000.00) Dollars, with expenses of the sale being Two Hundred Twenty-Six and 93/100 (\$226.93) dollars, leaving a gross balance owed by the said Defendant the sum of ONE THOUSAND TWO HUNDRED FORTY-

SIX and 08/100 (\$2,246.08)Dollars.

Plaintiff further alleges that after deducting the amount of the expenses from the sale and a net credit to the Defendant for an insurance refund in the sum of One Hundred Seventy-Nine and 08/100(\$179.08)dollars, there is now a balance owed by the Defendant to the Plaintiff in the amount of ONE THOUSAND SIXTY SEVEN (\$1,067.00)Dollars, which amount remains due and unpaid.

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

Plaintiff claims the additional sum of Two Hundred (\$200.00) dollars as a reasonable Attorney's fee, avering that, Two Hundred (\$200.00)dollars is a reasonable Attorney's fee as is provided for in said written instrument.



Attorney For Plaintiff

Defendant resides at
Fig Street, Fairhope,
Alabama.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The 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 Summon JESSIE L. SULLIVAN

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 _____

JESSIE L. SULLIVAN

_____, Defendant

by UNIVERSAL C.I.T. CREDIT CORPORATION, a corporation.

_____, Plaintiff

Witness my hand this

9

day of

Sept

1929

Reice - Clerk, Clerk

No. 3969

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

UNIVERSAL C.I.T. CORPORA-

TION, a corporation

Plaintiffs

vs.

JESSIE L. SULLIVAN

Defendants

Summons and Complaint

Filed

FILED

19

SEP 9 1959

Clerk

ALICE J. DUCK, CLERK
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Flg Street

Fairhope, Alabama

Received In Office

9/9

19 59

_____, Sheriff

I have executed this summons

this 10-19 19 59

by leaving a copy with

Jessie L. Sullivan

Sheriff claims 20 miles at

Ten Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY

Edleigh Stodham
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Edleigh Stodham Deputy Sheriff

Fairhope, Ala

UNIVERSAL C.I.T. CREDIT
CORPORATION, a corporation,
Plaintiff

-VS-

JESSIE L. SULLIVAN
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

PLEAS


COMES the Defendant in the above styled cause and for answer
to the Plaintiff's complaint and each and every count thereof says:

ONE

That the allegations of said complaint are untrue.

TWO

That the Defendant for answer to said complaint, saith that
she had paid the debt, for the recovery of which this suit was brought,
before such action was commenced.


Attorney for Defendant

NOTE: Defendant hereby demands
a trial by jury.


Attorney for Defendant

3967 *John Howard*
UNIVERSAL C.I.T. CREDIT
CORPORATION, a corporation

Plaintiff

VS

JESSIE L. SULLIVAN

Defendant

PLEAS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

FILED
OCT 24 1959
ALICE J. DUCK, CLERK
REGISTER

C. L. BORDER, Sr., M.D.

Foley, Alabama

Phone WH 3-7706

Reg. No. 4968

For _____

Address _____ Date _____

R To Whom —

Wm H. James, Foley,
Ala. Has duodenal
ulcers & I have him
on frequent medication
& frequent small meals
that are most important

Refill:

0-1-2-3-prn / Border Sr. M.D.

L. E. MORTON, M. D.

OFFICE: PHONE WH 3-4421

FOLEY, ALABAMA

REG. No. 8002

For _____ Age _____

R Address _____ Date 9/9 '60

Mrs. Angeline Callaway

So ill with Diabetes.
She is unable to work in
the house and needs an
attendant (her husband) at all
times.

L. E. Morton M. D.

REFILL 0 1 2 3 4 P.R.N.