


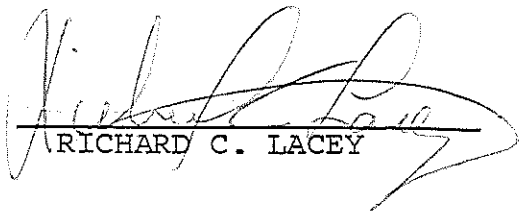
C/M MOBILE, INC.,) IN THE CIRCUIT COURT OF
Plaintiff) BALDWIN COUNTY, ALABAMA
VS.) AT LAW
EMMETT O. BLUMGREN,) CASE NO. ~~8660~~
Defendant) 8659

Comes the Defendant in the above styled cause and files this his answer to said Bill of Complaint and to each and every count thereof as follows:

1. The general issue.
2. Not guilty.
3. That said contract is void for lack of consideration.
4. That the Defendant did not receive any consideration for executing the contract.
5. That the Complainant made allegations to the Defendant to induce the Defendant to sign the contract and the said allegations were untrue.
6. That the Defendant did not receive the consideration set forth in said contract.


RICHARD C. LACEY
Attorney for Defendant

I do hereby certify that I have on this 16th day of March, 1970, served a copy of the foregoing pleading on Mayer W. Perloff of Perloff and Reid, Attorneys at Law in Mobile, Alabama by mailing the same by United States mail, properly addressed, and first class postage prepaid.


RICHARD C. LACEY

FILED

MAR 19 1970

ALICE J. DUCK CLERK
REGISTER

LAW OFFICES OF
PERLOFF & REID
SUITE 205 - VAN ANTWERP BLDG.
MOBILE, ALABAMA 36602

MAYER W. PERLOFF
T. DWIGHT REID
DONALD M. BRISKMAN

AREA CODE 205
TELEPHONE 433.5412

April 11, 1969

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

no. 8654

Re: C/M Mobile, Inc. v. BLUMGREN, Emmett O.

Dear Mrs. Duck:

Please find attached bill of complaint in the above captioned matter.

I would appreciate your letting me know when service is obtained against the defendant.

Very truly yours,

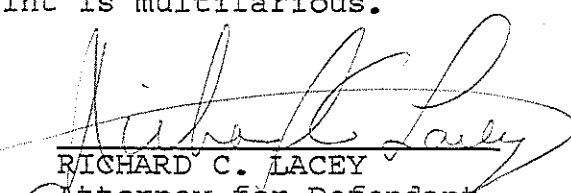

MAYER W. PERLOFF

/rms

C/M MOBILE, INC.,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS:)	AT LAW
EMMETT O. BLUMGREN,)	CASE NO. 8660
Defendant.)	8657

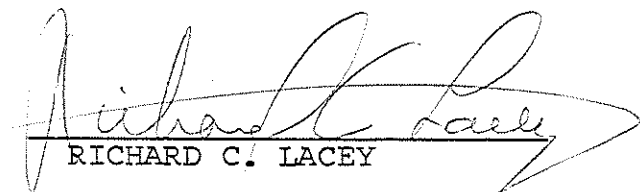
Comes the Defendant in the above styled cause and files this his demurrer to said Bill of Complaint and to each and every count thereof as follows:

1. That said Bill of Complaint is vague and unclear.
2. That said Bill of Complaint states no cause of action.
3. That said Bill of Complaint fails to state a cause of action.
4. That said Bill of Complaint fails to allege sufficient facts to support a cause of action.
5. That said Bill of Complaint is multifarious.


 RICHARD C. LACEY
 Attorney for Defendant

Defendant demands a trial by Jury.

I do hereby certify that I have on this 30th day of April, 1969, served a copy of the foregoing pleading on Mayer W. Perloff of Perloff and Reid, Attorneys at Law in Mobile, Alabama by mailing the same by United States mail, properly addressed, and first class postage prepaid.


 RICHARD C. LACEY

FILED

MAY 1 1969

ALICE J. DUCK CLERK REGISTER

C/M MOBILE, INC.
Plaintiff,
vs.
EMMETT O. BLUMGREN,
Defendant.

(IN THE CIRCUIT COURT OF
(BALDWIN COUNTY, ALABAMA,
(AT LAW
(
(CASE NO. 8657
~~8657~~

Plaintiff claims of the defendant the sum of \$451.94 for that heretofore on to-wit: Sept. 1, 1968, the defendant executed a written contract, a copy of which is attached and made a part hereof, wherein he agreed to pay plaintiff the sum of \$345.00 in installments of \$ ~~345.00~~ balance due within 8 weeks ~~in installments of \$345.00~~ interest, commencing on the to-wit: date of placement.

Plaintiff avers that defendant defaulted in payment thereunder on to-wit: Sept. 23, 1967 and pursuant to the terms of said contract the plaintiff herein has declared the entire balance due and owing.

Plaintiff avers that by the terms of said contract the defendant waived all right or claim of exemption under the Constitution and Laws of the State of Alabama and agreed to pay a reasonable attorney's fee in the event employment of an attorney was necessary for the collection, which said attorney's fee Plaintiff claims in the amount of \$112.98 which is 1/3 of \$338.96.

WHEREFORE, Plaintiff claims of the defendant \$338.96, plus interest, plus attorney's fee in the amount of \$112.98 as aforesaid.

PERLOFF & REID

Wayne H. Perloff
Attorneys for Plaintiff

Defendants may be served:

Route 1, Box 457-A
Daphne, Alabama

FILED

APR 15 1969

ALICE J. DUCK CLERK REGISTER

SUMMONS AND COMPLAINT

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 Emmett O. Blumgren

.....
.....
.....

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.....

Emmett O. Blumgren, Defendant.....

by C/M Mobile, Inc.

..... Plaintiff.....

Witness my hand this 15th day of April 19 69.

Alice J. Huck Clerk

En/4/23/69

8657

No. 8657 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

C/M MOBILE, INC.,
Plaintiffs

vs.

EMMETT O. BLUMGREN
Defendants

SUMMONS AND COMPLAINT

Filed April 15, 1969

Alice J. Duck Clerk

PERLOFF & REID
Plaintiff's Attorney

Defendant's Attorney

433-6124

Defendant lives at

RT 1 457A

Received Office
RECEIVED

Daphne

APR 16 1969 19.....

~~WILKINS~~ Sheriff

I have executed this summons

this 4-22 1969

by leaving a copy with

Emmett O. Blumgren

Sheriff claims 44 miles at

Ten Cents per mile Total \$ 4.40

TAYLOR WILKINS, Sheriff

BY Randall
DEPUTY SHERIFF

Wayn Wilkins, Sheriff

Roy Randall Deputy Sheriff

Sp. Fort