

H. H. BUNCHER COMPANY,
A CORPORATION,

PLAINTIFF

VS

HORACE R. HALL

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1203

Now comes the Defendant and for answer to the Plaintiff's complaint, and to each count thereof separately and severally, says:

1.

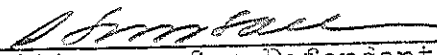
The facts therein alleged are untrue.

2.


That he has paid the debt or demand for the recovery of which this suit was brought before this action was commenced.

3.

That the Plaintiff, at the time of the commencement of this suit, was indebted to the Defendant in the sum of One Thousand Dollars by account to-wit, 5th day of June 1948, which he hereby offers to set off against the demand of the Plaintiff, and claims judgment for the excess.


Attorney for Defendant

Defendant demands a trial by Jury.


Attorney for Defendant

H. H. BUNCHER COMPANY
A CORPORATION

PLAINTIFF

VS

HORACE R. HALDEN

COMPLAINANT

FILED

AUG 19 1948

ALICE J. DUCK, Register

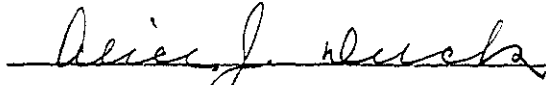
STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Horace R. Hall to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of H. H. Buncher Company, a Corporation.

WITNESS my hand this 2nd day of July, 1948.



Clerk of the Circuit Court of Baldwin
County, Alabama.

The Defendant resides at
Fairhope, Alabama.

H. H. BUNCHER COMPANY,
a corporation,

Plaintiff,

-vs-

HORACE R. HALL,

Defendant.

:
:
:
:
:
:

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

1. The plaintiff claims of the defendant \$600.00 due from him by account on, to-wit, the 8th day of June, 1948, which sum of money with interest thereon is still unpaid.

2. The plaintiff claims of the defendant the further sum of \$600.00 due from him on account stated between the plaintiff and defendant on, to-wit, the 8th day of June, 1948, which sum of money, with interest thereon, is still unpaid.

3. The plaintiff claims of the defendant the further sum of \$600.00 for merchandise, goods and chattels sold by the plaintiff to the defendant on the 8th day of June, 1948, which sum of money with interest thereon is still unpaid.

J. B. Blackburn
J. B. Blackburn

McCorvey, Turner, Rogers, Johnstone & Adams,

By

C. A. Rogers
Attorneys for the Plaintiff.

NOTE: There is attached hereto an itemized, verified statement of the account of H. H. Buncher Company against Horace R. Hall for the sum of \$600.00 due on the indebtedness made the basis of this action.

H. H. BUNCHER COMPANY

Ships Machinery and Equipment

Diesel Engines - Boilers - Generators - Pumps

Office and Yards

BLAKELEY ISLAND

Box 545, Mobile 4, Ala. June 8, 1948

Sold to Mr. H. R. Hall, Fairhope, Alabama

Terms: Net cash

-
- 1 Lot of blocks, steel and wood, turnbuckles, grappling hooks and miscellaneous rigging supplies as inspected, approved and ordered by your Mr. Hall, \$600.00 f.o.b. Blakeley Island Yard
-

STATE OF ALABAMA,
MOBILE COUNTY.

Before me, Murtle J. Jaullean, a Notary Public in and for said state and county, personally appeared Herbert S. Green, who is known to me, who being first duly sworn deposes and says that he is the Local Manager of H. H. Buncher Company, a corporation, the plaintiff in that certain action brought against H. R. Hall, of Fairhope, Alabama; that the above and foregoing itemized statement of the indebtedness of H. R. Hall to H. H. Buncher Company is just, true and correct, and affiant further alleges that the sum of \$600.00 is due by the defendant, H. R. Hall, to the plaintiff, H. H. Buncher Company, after allowing the said H. R. Hall all due and proper credits.

Herbert S. Green

Subscribed and sworn to before me
this 30th day of June, 1948.

Murtle J. Jaullean
Notary Public, Mobile County, Alabama.

Executed 7-17 1948
by serving copy of within Summons and
Complaint on

Horace R. Hall

Taylor Wilkins Sheriff
By H. R. Hall Deputy Sheriff

Received in Sheriff's Office
this 17 day of July, 1948
TAYLOR WILKINS, Sheriff

no 1203
ORIGINAL
SUMMONS AND COMPLAINT.

H. H. BUNCHER COMPANY, a Corpora-
tion,

Plaintiff,

VS.

HORACE R. HALL,

Defendant.

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

filed
7-2-48
Alvin J. Dicks
clerk

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

1203