

2311

STATE OF ALABAMA:

COUNTY OF BALDWIN:

Before me, the undersigned Notary Public, personally appeared TED WILMER, who being first duly sworn, deposes and says that he is the owner of WILMER'S PAINT & HARDWARE and that the attached itemized account is a true and correct statement of account between WILMER'S PAINT & HARDWARE and PAUL BONNELL.

Ted Wilmer
Ted Wilmer, Owner.

Subscribed and sworn to before me on this the 29 day of June, 1954.

Carl ...
Notary Public, Baldwin County, Alabama.

LAW OFFICES

RICKARBY & RICKARBY

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

ELLIOTT G. RICKARBY
(DECEASED)

30 June 1954

Mrs. Alice J. Duck
Clerk Circuit Court
Bay Minette, Ala.

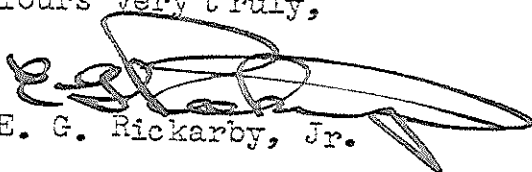
Dear Mrs. Duck:

Re: Wilmer's Paint & Hdwe.
Vs: Paul Bonnell

With this we are handing you itemized and verified statement of account in the above case.

Please process.

Yours very truly,


E. G. Rickarby, Jr.

R/i
cc: Wilmer's
2023
12 July

WILMER'S PAINT & HARDWARE
Plaintiff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

-vs-


PAUL BONNELL,
Defendant

COMPLAINT

The Plaintiff claims of the Defendant the sum of One Hundred Seventy and 73/100 Dollars (\$170.73) due from him by account on the 1st day of February, 1952; which sum of money together with interest thereon is still due and unpaid.

RICKARBY & RICKARBY

By:



E. G. Rickarby, Jr.,
Attorney for Plaintiff.

The account sued on is evidenced by an itemized and verified statement of account filed herewith.

FILED
July 3, 1954
ALICE J. DUCK, Clerk

RICKARBY & RICKARBY

By:


E. G. Rickarby, Jr.,
Attorney for Plaintiff.

SUMMONS AND COMPLAINT

Moore Printing 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 Paul Bonnell

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 _____
Paul Bonnell

by _____, Defendant
Wilmer's Paint & Hardware

_____, Plaintiff

FILED

by _____ my hand this

3rd

day of July

1954

July 3, 1954

Alice J. Duck, Clerk

Alice J. Duck, Clerk

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WILMER'S PAINT & HARDWARE,
Plaintiff,
vs.
PAUL BONNELL,
Defendant.

I
I IN THE CIRCUIT COURT OF
I BALDWIN COUNTY, ALABAMA
I
I
I

Comes the Defendant in the above styled cause and demurs to the Complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said Complaint does not state a cause of action.
2. That the statement of such Complaint that the account sued on is evidenced by an itemized and verified statement of account is but a conclusion of the Pleader.
3. That no statement of any itemized, verified account was attached to the copy of the Complaint which was served upon the Defendant.

James H. Stone
Attorneys for Defendant.

Defendant demands a trial of this cause by a jury.
James H. Stone
Attorneys for Defendant.

FILED
Aug. 2, 1954
ALICE J. DUCK, Clerk