

COMPLAINT

PANICH SPECIALTY SHOP

PLAINTIFF

VS

TOM C. CONNER

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

5210

I

The plaintiff claims of the defendant the sum of One hundred Fifty two and 80/100 (\$152.80) Dollars, due from him on account, to-wit: the 2nd day of May, 1960, which sum of money, with interest thereon is still unpaid.

II

The plaintiff claims of the defendant One hundred Fifty two and 80/100 (\$152.80) Dollars, due from him for merchandise, goods, and chattels sold by the plaintiff to the defendant on, to-wit: the 2nd day of May, 1960, which sum of money, with interest thereon, is still unpaid.

  
Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof an itemized statement of account verified by Ike Panich, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 2nd day of May, 1960, and due at present.

The defendant resides at Gulf Shores, Alabama



## STATEMENT

FROM.....Panich Specialty Shop  
 Marianna, Ark.  
 .....

June 22.....19 62

TO.....Tom C. Conner  
 .....  
 .....

5/2/60

Balance per attached statement

\$152.80

I, Ike Panich, being duly sworn, depose and state on oath that I am duly authorized to make this affidavit; that the above statement is true and correct to the best of my knowledge and belief; that there are no credits or offsets due thereon; and that there have been no payments other than shown above.

Ike Panich

Subscribed and sworn to before me this 22nd  
 day of June 19 62

James B. Zimmerman Notary Public

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,  
Baldwin County.

Circuit Court, Baldwin County

No. \_\_\_\_\_

\_\_\_\_\_ TERM, 19\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Tom C. Conner

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 \_\_\_\_\_

Tom C. Conner

\_\_\_\_\_, Defendant.---

by Panich Specialty Shop

\_\_\_\_\_, Plaintiff.---

Witness my hand this 19 day of July 1962

W. J. Conner, Clerk

Exp- 8-1-62

*Gulf Shores*  
No. 5210

Page \_\_\_\_\_

**STATE of ALABAMA**

Baldwin County

**CIRCUIT COURT**

*Panich Specialty Shop*

Plaintiffs

vs.

*Tom C. Conner*

Defendants

**Summons and Complaint**

Filed

**FILED**

JUL 19 1962

19\_\_

CLERK  
REGISTER

*ALICE J. DUCK*

Clerk

*J. A. Brice*

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

*Gulf Shores, Alabama*

Received In Office

*7-19, 1962*

Sheriff.

I have executed this summons

this *1st August* 19*62*  
by leaving a copy with

*Tom C. Conner*

Sheriff claims *100*

miles at *7*

Ten Cents per mile Total \$ *10.00*

*TAYLOR WILKINS*, Sheriff

BY

*Taylor Wilkins*  
DEPUTY SHERIFF

*Taylor Wilkins*

Sheriff.

*Carlisle Childress*

Deputy Sheriff.

*Gulf Shores*

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

P.O. Box 298

WHITEHALL 3-3601

January 31, 1963

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

Re: Pannich Specialty Shop  
Vs: Tom C. Conner  
At Law, No. 5210

Dear Mrs. Duck:

Kindly dismiss complaint in the above cause, and  
send me a cost bill. Please remove from the February  
12th non-jury docket.

Thank you.

Sincerely,

  
James A. Brice

JAB:j

cc: Wilters & Brantley  
Attorneys at Law  
Bay Minette, Alabama

PANICH SPECIALTY SHOP,

PLAINTIFF

VS

TOM C. CONNER,

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW, CASE NO. 5210

comes now the Plaintiff in the above styled cause and amends  
the styling of said case so that same shall read as follows:

IKE PANICH, Individually and  
d/b/a PANICH SPECIALTY SHOP,

PLAINTIFF

VS

TOM C. CONNER,

DEFENDANT

IN THE CIRCUIT COURT  
OF BALDWIN COUNTY,  
ALABAMA,  
AT LAW, CASE NO. 5210

  
Attorney for Plaintiff

I certify that a copy of the above  
styled pleading has been mailed to  
Wilters & Brantly, attorneys for defend-  
ant, this date postage prepaid.

Done this 24<sup>th</sup> day of September,  
1962.

  
Attorney for Plaintiff

**FILED**

SEP 25 1962

ALICE J. DUCK, CLERK  
REGISTER

IKE PANICH, Individually and  
d/b/a PANICH SPECIALTY SHOP,

PLAINTIFF

VS

TOM C. CONNER,

DEFENDANT

IN THE CIRCUIT COURT OF

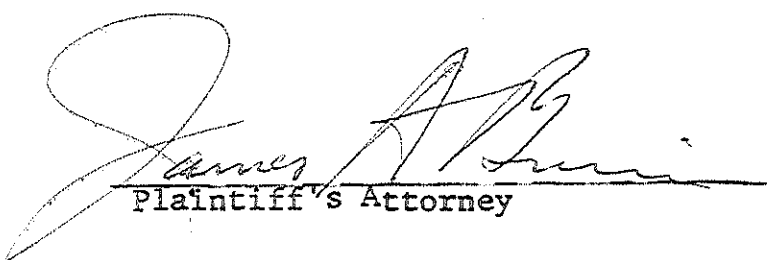
BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. 5210

MOTION TO STRIKE

Comes now the Plaintiff in the above styled cause and files this his motion to strike the demand for trial by jury heretofore filed by the defendant, and his grounds for said motion assigns the following:

1) That defendant was served with service of process on August 1, 1962, and demanded trial by jury on September 5, 1962, which demand was filed more than 30 days after perfection of service on the defendant, and such late demand for trial by jury deprives defendant of right to trial by jury in accordance with Title 7, Section 260, Code of Alabama, 1940.

  
Plaintiff's Attorney

I certify that a copy of the above motion to strike has been mailed, postage prepaid to Wilters and Brantley, attorneys for defendant, on this 24th day of September 1962.

  
Attorney for Plaintiff

*Filed  
9/25/62  
Linn  
J. Linn*



PANICH SPECIALTY SHOP,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
TOM C. CONNER,	X	AT LAW
Defendant.	X	CASE NO. 5210

Comes now the Defendant in the above styled cause and files this his plea in abatement to the Complainant's Complaint and for grounds thereof says:

1.

That the Complaint does not state whether the Panich Specialty Shop is an individual, firm or corporation.

WILTERS & BRANTLEY

By:

*Harry J. Wilters, Jr.*  
 Harry J. Wilters, Jr.  
 Attorney for the Defendant

The Defendant demands a trial by jury.

WILTERS & BRANTLEY

BY:

*Harry J. Wilters, Jr.*  
 FILED  
 SEP 5 1962  
 ALICE L. DUCK, CLERK  
 REGISTER