

STATE OF ALABAMA )  
BALDWIN COUNTY ) . . . IN THE CIRCUIT COURT . . . LAW SIDE . . .

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon Edward O'Connor to appear within thirty (30) 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 Baldwin Oil Mills, Inc., a corporation.

WITNESS my hand this the 21 day of Sept., 1961.

Walter J. Duck  
Clerk

Ed - 9-21-61  
\*\*\*\*\*

BALDWIN OIL MILLS, INC., )  
a corporation, )  
Plaintiff, )  
-VS- )  
EDWARD D. O'CONNOR )  
Defendant. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

4880

COUNT 1

The Plaintiff claims of the defendant FIFTY-FIVE THOUSAND SIX HUNDRED SIXTY-FOUR AND 95/100 DOLLARS (\$55,664.95) damages for the wrongful taking of the following goods and chattels of the Plaintiff as follows, viz: FIFTY-FIVE THOUSAND SIX HUNDRED SIXTY-FOUR AND 95/100 DOLLARS (\$55,664.95).

COUNT II

The Plaintiff claims of the defendant FIFTY-FIVE THOUSAND SIX HUNDRED SIXTY-FOUR AND 95/100 DOLLARS (\$55,664.95) damages for the

(first page)

conversion by him from February, 1954 through July 13, 1961 of the following chattels; soybeans, the property of the Plaintiff.

COUNT III

The Plaintiff claims of the Defendant FIFTY- FIVE THOUSAND SIX HUNDRED SIXTY-FOUR AND 95/100 DOLLARS (\$55,664.95) damages for the embezzlement by him of funds of the Plaintiff from February 1954 through July 13, 1961.

  
Attorney for Plaintiff

FILED

SEP 21 1961

ALICE L. DUCK, CLERK  
REGISTER

4880

SUMMONS AND COMPLAINT

Received \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
and on 21 day of Sept 1961  
served a copy of the within Se C  
on Edward D O'Connor  
by service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. A. Albert D. S.  
omni

Baldwin Oil Mills, Inc., a Corp.,  
Plaintiff

vs

Edward D. O'Connor,  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

FILED

SEP 21 1961

ALICE J. DUCK, CLERK  
REGISTER

CECIL G. CHASON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

BALDWIN OIL MILLS, INC.,  
a corporation,

Plaintiff,

VS.

EDWARD D. O'CONNOR

Defendant.

IN THE CIRCUIT COURT OF


BALDWIN COUNTY, ALABAMA

AT LAW

PLEA

Now comes the Defendant in the above styled cause and  
for plea to the complaint heretofore filed in said cause and to  
each count thereof separately and severally says:

1. The allegations of the complaint are untrue.

  
Attorney for Defendant

Defendant respectfully demands a trial  
by Jury of said cause.

  
Attorney for Defendant

FILED

SEP 27 1961

ALICE J. DUCK, CLERK  
REGISTER