

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 Dairy Fresh Corporation 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 Wes Morris, Jr.

Witness my hand this 5 day of February, 1962.

Alice J. Duck
Clerk

WES MORRIS, JR.,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
vs.	I	BALDWIN COUNTY, ALABAMA
DAIRY FRESH CORPORATION,	I	AT LAW
Defendant.	I	5017
	I	

The Plaintiff claims of the Defendant \$402.77 for work and labor done for the Defendant by the Plaintiff as a route salesman or delivery man until, to-wit: May 6, 1960, at the request of the Defendant, which sum of money, with interest thereon from May 6, 1960, is still unpaid.

CHASON & STONE

FILED

FEB 5 1962

ALICE J. DUCK, CLERK
REGISTER

By:

Marion P. Stone
Attorneys for Plaintiff

RECEIVED

FEB -7 1962

SHERIFF'S OFFICE

WES MORRIS, JR.,

Plaintiff,

VS.

DAIRY FRESH CORPORATION,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

FILED

FEB 5 1962

ALICE J. DUCK, CLERK
REGISTER

CHASON & STONE

ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

Received 5 day of Feb 1962
and on 8 day of Feb 1962
I served a copy of the within 1st
Dairy Fresh Corporation

By service on Mr. Mearns


TAYLOR WILKINS, Sheriff

By A. J. Duck D.S.

WES MORRIS, JR.,)	IN THE CIRCUIT COURT OF
	:	
Plaintiff,)	BALDWIN COUNTY, ALABAMA
	:	
vs.)	AT LAW
	:	
DAIRY FRESH CORPORATION,)	
	:	
Defendant.)	CASE NO. 5017

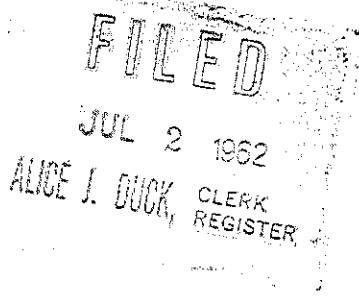
PLEA 1.

The Plaintiff, for answer to the Complaint, saith that he tendered to the Plaintiff the amount due to him, to-wit: ONE HUNDRED THIRTY-EIGHT AND 32/100 (\$138.32) DOLLARS, before the action was commenced, and, now brings the money into Court.


 Fred F. Smith, Jr.
 Attorney for Defendant

Attorney for Plaintiff:

Norborne C. Stone, Jr.
 Chason & Stone



WES MORRIS, JR.,

Plaintiff,

vs.

DAIRY FRESH CORPORATION,

" Defendant.

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IN THE CIRCUIT COURT OF

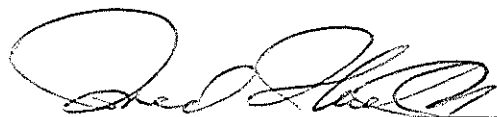
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO.

Comes now the defendant in the above styled cause and files the following separate and several demurrers to the plaintiff's complaint, seperately and severally to each count, and says as follows:

1. For aught that appears, the plaintiff fails to state a cause of action.
2. For aught that appears, the plaintiff is claiming for work and labor without specifying of what the said work and labor consisted.
3. For aught that appears, the plaintiff is collecting for work and labor and simultaneously therewith claiming to be a route salesman or delivery man.
4. For aught that appears, the defendant is unable to determine from the plaintiff's allegation whether or not the plaintiff is claiming for work and labor or for wages or comissions as a route salesman or delivery man.

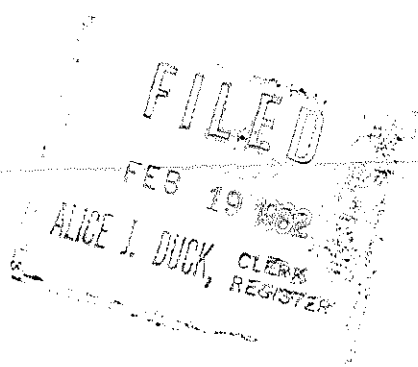


FRED F. SMITH, JR.
Attorney for Defendant

ATTORNEY FOR PLAINTIFF:

CHASON & STONE

*The defendants demand
a jury trial in this cause.*



WES MORRIS, JR.,	*	IN THE CIRCUIT COURT OF
Plaintiff,	*	BALDWIN COUNTY, ALABAMA
vs.	*	AT LAW
DAIRY FRESH CORPORATION,	*	CASE NO. 5017
Defendant.	*	

Comes now the defendant in the above styled cause and files a demand for a bill of particulars to require the plaintiff to itemize in detail the services, goods, work or labor or otherwise which the plaintiff performed for the defendant and at the request of the defendant which constitutes the claim for which the plaintiff sues in this cause.



FRED F. SMITH, JR.
Attorney for Defendant

ATTORNEY FOR PLAINTIFF:

Norborne C. Stone, Jr.
CHASON & STONE

