

LAW OFFICES
E. G. RICKARBY
392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

May 23, 1963

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

5559

Dear Mrs. Duck:

Re: Miriam D. Boswell
Vs: Carr-Boswell Tractor Co., Inc.
Case Number - At Law
Our File: 63-126

Enclosed find Pleas, copy of which was this day mailed
to Mr. John Earle Chason of Chason & Stone, Attorneys
at Law, Bay Minette, Alabama.

Yours very truly,



EGR/ts
Encl.
cc: Mr. John Earle Chason
5/31/63

MIRIAM D. BOSWELL,

Plaintiff,

vs.

CARR-BOSWELL TRACTOR CO.,
INC.,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

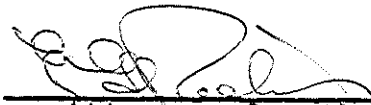
AT LAW.

P L E A S

Comes the Defendant in the above styled cause, and for answer to the Plaintiff's complaint, offers the following separate and several pleas to each and every count thereof, separately and severly:

ONE

The Defendant avers that the allegations of said complaint, and each and every count thereof, separately and severly, are untrue.



Attorney for the Defendant.

Note: The Defendant demands a trial by Jury.

FILED

MAY 27 1963

ALICE J. DUCK, CLERK
REGISTER



Attorney for the Defendant.

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Carr-Boswell Tractor Co., Inc., 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 Miriam D. Boswell.

WITNESS my hand this 3rd day of May, 1963.

Alice D. Duval
Clerk

MIRIAM D. BOSWELL,

Plaintiff,

vs.

CARR-BOSWELL TRACTOR CO., INC.,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

5559

COUNT ONE

The Plaintiff claims of the Defendant Three Hundred Dollars (\$300.00) due by Promissory Note made by it on the 29th day of September, 1962, and payable on the 30th day of October, 1962, with interest thereon from October 29, 1962, at the rate of 8% per annum.

The Plaintiff further avers that in and by the terms of said Promissory Note the Defendant agreed to pay all costs of collecting or securing or attempting to collect or secure said note, including a reasonable attorney's fee and the Plaintiff claims of the Defendant the further and additional sum of Seventy-five Dollars (\$75.00) as such reasonable attorney's fee.

COUNT TWO

The Plaintiff claims of the Defendant the further and addi-

tional sum of One Thousand Ninety-eight Dollars (\$1,098.00) for money loaned by the Plaintiff to the Defendant on the 16th day of November, 1962, which sum of money, with the interest thereon, is still unpaid.

COUNT THREE

The Plaintiff claims of the Defendant the further and additional sum of Two Thousand Eight Hundred Dollars (\$2,800.00) for money on the 29th day of September, 1962, received by the Defendant to the use of the Plaintiff, which sum of money, with interest thereon, is still unpaid.

COUNT FOUR

The Plaintiff claims of the Defendant the further and additional sum of Ninety-six Dollars and Eighty-eight Cents (\$96.88) for work and labor done for the Defendant by the Plaintiff from December 1, 1962, to December 14, 1962, at its request, which sum of money, together with interest thereon, is still unpaid.

CHASON & STONE

By: John Earl Chason

Defendant's Address:
Robertsdale, Alabama

FILED

MAY 3 1963

ALICE J. DUCK, CLERK
REGISTER

EX-5-17-63

Received 3¹⁶ day of May 1963
and on 17 day of May 1963
I served a copy of the within D & C
on Carr Boswell Tractor
By service on Walter Carr
as officer of company
TAYLOR WILKINS, Sheriff
By J. W. Rye D. S.

3694
L d 5559

MIRIAM D. BOSWELL,

Plaintiff,

VS

CARR-BOSWELL TRACTOR CO.,
INC.,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

FILED

MAY 3 1963

ALICE J. DUCK, CLERK
REGISTER

RECEIVED

MAY 16 1963

SHERIFF'S OFFICE

CHASON & STONE

ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

We the jury find for the Plaintiff
\$395.00 a permanent wage not any
\$2904.12 a op account
The Plaintiff
Jury