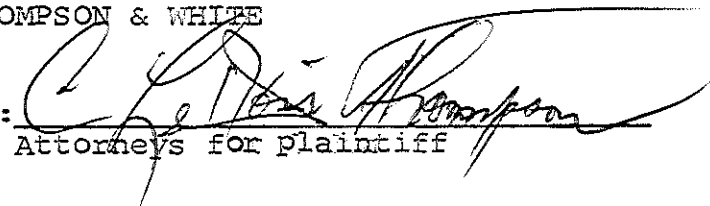


R. H. HINOTE	X	
Plaintiff	X	
vs	X	IN THE CIRCUIT COURT OF
COMPLETED HOMES, INC., a	X	BALDWIN COUNTY, ALABAMA
corporation and JAMES W.	X	
BURKETT, JR., and WILLIAM	X	AT LAW
M. CAGLE, JR.	X	NO. 5633
Defendants	X	

Comes the plaintiff in the above styled cause and propounds the following interrogatories to the defendant, William M. Cagle, Jr.:

1. State your name.
2. Are you an officer, agent, servant or employee of Completed Homes, Inc.?
3. Name each capacity in which you serve the said corporation.
4. In the course of operating Completed Homes, Inc., did the corporation have occasion to do business with R. H. Hinote of Robertsdale, Alabama?
5. Was the work which Mr. Hinote did for the corporation, the installation of sewage or septic tank facilities or other work involving concrete mixtures?
6. List the projects on which R. H. Hinote was employed or contracted with for work.
7. State the amount of the account or contract which R. H. Hinote entered into with Completed Homes, Inc., on each project.
8. Show the amount paid by Completed Homes, Inc., to R. H. Hinote on each project.
9. State whether or not Completed Homes, Inc., has been paid for the contract between Completed Homes, Inc., and the landowner on each of the projects involving the services of R. H. Hinote.

THOMPSON & WHITE

BY: 
Attorneys for plaintiff

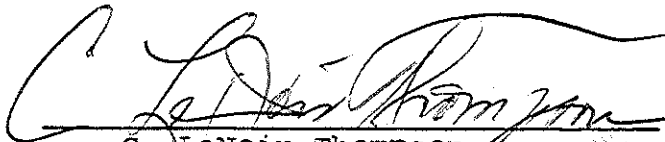
FILED
JUL 15 1963
ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA


BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on oath and says as follows:

My name is C. LeNoir Thompson and I am one of the Attorneys of Record for the plaintiff in the above entitled cause, and as such, I am authorized to make this affidavit. I further state that the answer of the defendant to the foregoing interrogatories will, if truthfully made, be material evidence for the plaintiff on the trial of said cause.


C. LeNoir Thompson

Subscribed and sworn to before me by the said C. LeNoir Thompson on this the 15th day of July, 1963.


Notary Public

22a 5633 3781

Received 15 day of July 1963
and on 17 day of July 1963
I served a copy of this within
on Wm. M. Cagle, Jr.

By service on: Wm. M. Cagle, Jr.
Ray L. Bridger
TAYLOR WILKINS Sheriff
or H. Davis

R. H. Hinde

05

Completed James Inc.

Interrogatories

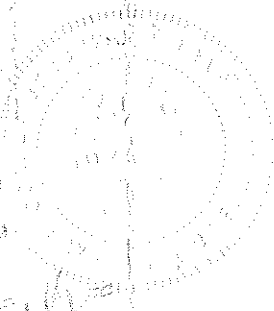
RECEIVED

JUL 16 1963

SHERIFF'S OFFICE

to be served via

William M. Cagle



TONSMEIRE & MCFADDEN
ATTORNEYS AND COUNSELLORS AT LAW
SUITE 407 FIRST NATIONAL ANNEX
MOBILE, ALABAMA

GEORGE A. TONSMEIRE
STOVA F. MCFADDEN
WILLIAM R. FAVRE, JR.
EDWARD J. VULEVICH, JR.

August 6, 1963

TELEPHONE: 433-6561
AREA CODE: 205

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

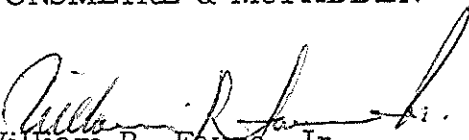
Re: R. H. Hinote vs. Completed Homes, Inc., et al,
Case #5633

Dear Mrs. Duck:

Please find enclosed Answers to Interrogatories in connection with
the captioned case.

Yours very truly,

TONSMEIRE & MCFADDEN


William R. Favre, Jr.

frf

Enclosure

R. H. HINOTE)	IN THE CIRCUIT COURT
Plaintiff)	OF BALDWIN COUNTY,
VS)	ALABAMA
COMPLETED HOMES, INC., a)	AT LAW
corporation and JAMES W. BURKETT,)	
JR. and WILLIAM M. CAGLE, JR.)	NO. 5633
Defendants)	

Comes now William M. Cagle, Jr., one of the defendants in the above styled cause, and files the following answers to the interrogatories heretofore propounded to him by the plaintiff:

1. William M. Cagle, Jr.

2. Yes.

3. Secretary

4. Yes.

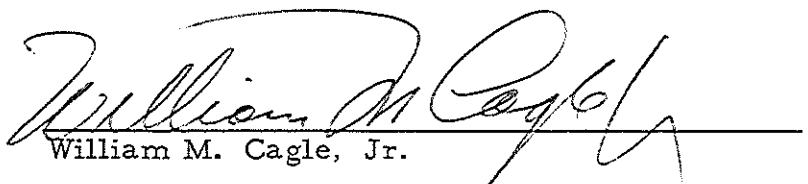
5. Yes.

6. ~~There was a total of five jobs, Driskell, Sanspree and Wallace,~~
the other two I am unable to determine the names.

7. Mr. Hinote agreed with Completed Homes, Inc. that he would install the septic tanks and necessary field lines on each job and have them approved by the Health Department for a total consideration of \$440.00 for each job, regardless of the number of lines necessary to be installed on each job.


8. It is impossible for me to determine how much has been paid to Mr. Hinote on each job as the matter was left as an open and running account, however, the corporation records show that a total paid to Mr. Hinote was \$1,565.76.

9. Yes.


William M. Cagle, Jr.

State of Alabama)
County of Mobile)

Before me, the undersigned authority in and for said state and county, personally appeared William M. Cagle, Jr., known to me, and being by me first duly sworn, on oath, deposes and states that the answers stated in the foregoing interrogatories are true and correct.


William M. Cagle, Jr.


Subscribed and sworn to before me

this the 7th day of August, 1963.


Notary Public, Mobile County, Alabama

TONSMEIRE & McFADDEN

By 
Attorneys for Defendant, William M. Cagle, Jr.

CERTIFICATE OF SERVICE
I do hereby certify that I have on this 7th day of August, 1963, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.


FILED

AUG 9 1963

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 5632

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon COMPLETED HOMES, INC., a corporation and
JAMES W. BURKETT, JR., and WILLIAM M. CAGLE, JR.

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 -----
COMPLETED HOMES, INC., A CORPORATION and JAMES W. BURKETT, JR.,
and WILLIAM M. CAGLE, JR. -----, Defendant

by R. H. HINOTE -----
-----, Plaintiff

Witness my hand this 15 day of July 1963
W. J. H. HINOTE, Clerk

10a
No. 5633

Page

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

R. H. HINOTE

Plaintiffs

vs.

17
COMPLETED HOMES, INC., a corpora-
tion and JAMES W. BURKETT, JR.,
and WILLIAM M. CAGLE, JR.

2054 1/2 Senator St. Mobile, Alabama
Defendants

Summons and Complaint

Filed

FILED

19

JUL 15 1963

ALICE J. DUCK, CLERK
REGISTER

Clerk

Mr. Burkett in
jurisdiction

Plaintiff's Attorney

Defendant's Attorney

2054 1/2 Defendant lives at
Senator St.
Mobile, Alabama

Received In Office

July 15, 1963

Sheriff.

I have executed this summons

this 19
by leaving a copy with

Sheriff.

Deputy Sheriff.

R. H. HINOTE

Plaintiff

vs

COMPLETED HOMES, INC., a
corporation and JAMES W.
BURKETT, JR., and WILLIAM
M. CAGLE, JR.

Defendants

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 5633

-1-

Plaintiff claims of the defendant One Thousand One Hundred Forty-four and 73/100 Dollars (\$1,144.73) due from them by account on to-wit, the 1st day of August, 1962, which sum of money with interest thereon is still unpaid.

-2-

The plaintiff claims of the defendants the sum of One Thousand One Hundred Forty-four and 73/100 Dollars (\$1,144.73) for money paid by the plaintiff for the defendants on to-wit, the 1st day of August, 1962, at their request which sum of money with interest thereon is still unpaid.

-3-

The plaintiff claims of the defendants the sum of One Thousand One Hundred Forty-four and 73/100 Dollars (\$1,144.73) for work and labor done for the defendants by the plaintiff on to-wit, August 1, 1962, at their request which sum of money with interest thereon is still unpaid.

THOMPSON & WHITE

BY: 

Attorneys for plaintiff

FILED

JUL 15 1963

ALICE J. DUCK, CLERK
REGISTER

R. H. HINOTE,

Plaintiff,

VS.

COMPLETED HOMES, INC., ET AL,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

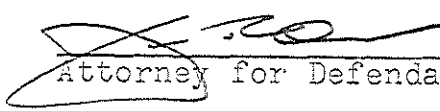
AT LAW

NO. 5633

PLEA

Now come the defendants in the above styled cause and for plea to the complaint heretofore filed in said cause and to each count thereof say:

1. The allegations of the complaint are untrue.
2. The allegations of the said count are untrue.


Attorney for Defendants