

EMILY B. PACKER, )  
Plaintiff, ) IN THE CIRCUIT COURT OF  
VS. ) BALDWIN COUNTY, ALABAMA  
WILL PACKER, ) AT LAW NO. 5885  
Defendant. )

DEMURRER

Now comes the defendant and for demurrer to the complaint assigns, separately and severally, the following:

1. It does not state a cause of action.
2. It is vague, indefinite and uncertain, in that it does not allege with sufficient certainty when the work and labor alleged in the complaint was done or furnished.
3. It is vague, indefinite and uncertain, in that it alleges that work and labor was done by the plaintiff for the defendant for the period of time commencing in September of 1958 and ending in December of 1963, but does not allege the date or times on which the work was done or labor furnished.

*J. B. Blackburn*  
Attorney for Defendant

FILED  
JAN 27 1964  
ALICE L. DUCK, CLERK  
REGISTER

DEMURRER

EMILY B. PACKER,

Plaintiff,

VS.

WILL PACKER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5885

FILED

JAN 27 1964

ALICE J. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

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

December TERM, 19 63

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Will Packer

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 Will Packer

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

by Emily B. Packer

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

Witness my hand this 31 day of December 19 63

Olivia J. Packer, Clerk

64-1-9-64

No. 5885

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THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

Emily B. Packer

Plaintiffs

vs.

Will Packer

Defendants

SUMMONS and COMPLAINT

Filed **FILED**, 19

DEC 31 1963, Clerk

ALICE J. DUCK, CLERK  
REGISTER

K. Cooper  
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Perdido, Ala.

RECEIVED IN OFFICE

Dec. 31, 1963

Sheriff

I have executed this summons

this Jan 9, 1964

by leaving a copy with

Will Packer

Sheriff claims 26 miles

Ten Cents per mile Total 2.60

TAYLOR WILKINS, Sheriff

BY W. A. Talbot  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. A. Talbot Deputy Sheriff

Perdido

EMILY B. PACKER

PLAINTIFF

VS

~~PACKER~~  
WILL ~~PACKER~~

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

5-885

COUNT ONE

The Plaintiff claims of the Defendant Seven Thousand Three Hundred Fourteen and No/100 (\$7,314.00) Dollars for work and labor done for the defendant by the Plaintiff from the 25th day of September, 1958, through the 25th day of December, 1963, at his request; which sum of money, with interest thereon, is still unpaid.

*Kenneth Cooper*  
Kenneth Cooper  
Attorney For Plaintiff

Defendants address is:

Will Parker  
Perdido, Alabama

FILED  
DEC 31 1963  
ALICE L. DUCK, CLERK  
REGISTER