

GENERAL ELECTRIC CREDIT CORP-
ORATION, INC., a Corporation,
as the Assignee S & S TV &
Appliance Company of Grand
Rapids, Michigan,

Plaintiff,

Vs.

KENNETH STEINER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

5973

DEMURRER

Comes now the Defendant, Kenneth Steiner, and demurs to the complaint filed in said cause, and assigns the following separate and several grounds, viz:

1.

That said complaint does not state a cause of action.

2.

That it is not alleged that the Plaintiff or its assignor was qualified to do business in the State of Alabama at the time that said contract was entered into or at the time of the filing of the suit in said cause.

3.

That the terms of the contract referred to in count 1 of said complaint are not sufficient.

WILTERS, BRANTLEY & NESBIT

BY: Thos. S. Nesbit

Attorneys for Kenneth Steiner

Defendant demands a trial by jury.

WILTERS, BRANTLEY & NESBIT

BY: Thos. S. Nesbit

Attorneys for Kenneth Steiner

FILED

APR 6 1964

ALICE I. DICK, CLERK
REGISTER

GENERAL ELECTRIC CREDIT CORPORATION, INC., a Corporation,
as the Assignee S & S TV &
Appliance Company of Grand
Rapids, Michigan,

Plaintiff,

Vs.

KENNETH STEINER,

Defendant.

DEMURRER

WILTERS, BRANTLEY & NESBIT
Attorneys for Defendant

Defendant.

AT LAM.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon KENNETH STEINER

ROUTE 1, ROBERTSDALE, ALABAMA

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 Kenneth Steiner

_____, Defendant.

by General Electric Credit Corporation, Inc., a corporation, as the

assignee of S & S TV & Appliance Company

_____, Plaintiff.

Witness my hand this 12th day of March 19 64

Ex-3-22-64 Alice J. Duck, Clerk

No. 5973

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

GENERAL ELECTRIC CREDIT CORPORATION
INC., a corporation, as Assignee
of S & S TV & Appliance Company

Plaintiffs

vs.

KENNETH STEINER

Defendants

Summons and Complaint

Filed

FILED

19 64

MAR 12 1964

Clerk

**ALICE L. DUCK, CLERK
REGISTER**

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

L. Steiner

Received In Office

3/13 1964

Sheriff

I have executed this summons

this

March 22 1964

by leaving a copy with

Kenneth Steiner

Sheriff claims

50

files at

Ten Cents and will T. and C.

5.00

TAYLOR WILKINS, Sheriff

BY

Hand
Deputy Sheriff

Taylor Wilkins Sheriff

H. L. Hall Deputy Sheriff