

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 James Stewart 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 Mary Shaffer.

Witness my hand this 21 day of September, 1964.

Alice J. Duck
Clerk

MARY SHAFFER,

Plaintiff,

vs.

JAMES STEWART,

Defendant.

Y
Y
Y
Y
Y
Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

6197

COUNT ONE:

The Plaintiff claims of the Defendant \$750.00 damages for the conversion by him, on the 23rd day of September, 1963, of the following chattels: a 1954 Ford Tudor (Hardtop) automobile, the property of the Plaintiff.

CHASON, STONE & CHASON

By:

John E. Chason
Attorneys for Plaintiff

FILED
SEP 21 1964
MADE L. DUCK, CLERK
REGISTER

64-9-29-64

6197

MARY SHAFFER,

Plaintiff,

VS.

JAMES STEWART,

Bay Minette, Ala.
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

FILED

SEP 21 1960

ALICE J. DICK, CLERK
REGISTER

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120

Received 22 day of Sept 1960
and on 29 day of Sept 1960
served a copy of the within Rec
in James Stewart
by service on _____

TAYLOR WILKINS, Sheriff

By W. A. Talbert
om 1

MARY SHAFFER

Plaintiff

vs

JAMES STEWART

Defendant

X

X

X

X

X

IN THE CIRCUIT COURT OF


BALDWIN COUNTY, ALABAMA

AT LAW NO. 6197

Comes C. LeNoir Thompson, attorney in the above styled
cause and withdraws his appearance as attorney in said cause.



I hereby certify that I have mailed a copy of the foregoing
motion postage prepaid to the defendant at his address in
Bay Minette, Alabama, THIS 21st day of April, 1965.



Copy mailed Hon. Horbome Stone
Atty for Plaintiff Apr 21, 1965



FILED

APR 22 1965

ALICE L. DUCK, CLERK
REGISTER

MARY SHAFFER

Plaintiff

vs.

JAMES STEWART

Defendant

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6197

Comes the defendant and for demurrer to said complaint filed in said cause shows unto this Honorable Court as follows:

1. That said complaint fails to state a cause of action.
2. That said complaint fails to allege sufficient identification of the automobile noted in said complaint.
3. That said complaint fails to properly identify the subject of the alleged conversion.

THOMPSON & WHITE

BY:


Attorneys for defendant.

FILED

OCT 22 1964

ALICE L. DICK, CLERK
REGISTER