

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons V. V. Rhodes, Jr., to appear and plead, answer or demur within thirty days from the service hereto to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, by Robertsdale Milling and Elevator Company, Inc., a corporation.

Witness my hand this the 27 day of Feb, 1964.

Alice J. Duck
Clerk

ROBERTSDALE MILLING AND ELEVATOR
COMPANY., INC., A CORPORATION

PLAINTIFF

VS

V.V. RHODES, JR.

DEFENDANT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5944

I.

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SIXTY* EIGHT AND 85/100 DOLLARS (\$496.85) due from him by account on the 8th day of July, 1961, which sum of money with the interest thereon, is still unpaid.

WILTERS, BRANTLEY AND NESBIT

BY: Walters, Brantley & Nesbit

Attorneys for the Plaintiff

FILED

FEB 27 1964

ALICE J. DUCK, CLERK
REGISTER

*By may be served
at Bay Minette, Ala.
64-2-28-64*

No. 5944

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

Received 27 day of Feb 1964
Filed on 28 day of Feb 1964
served a copy of the within 27 Rhodes Jr
by service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbert S.
om

ROBERTSDALE MILLING AND ELEVATOR CO.,
INC., A CORPORATION

PLAINTIFF

VS

V. V. RHODES, JR.

DEFENDANT

SUMMONS AND COMPLAINT

FILED

FEB 27 1964

ALICE J. DUCK, CLERK
REGISTER

ROBERTSDALE MILLING AND ELEVATOR)
COMPANY, INC., A CORPORATION,)

Plaintiff)

vs)

V. V. RHODES, JR.)

Defendant.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

No. 5944

Comes now the Defendant in above-styled cause, and demur to the Bill of Complaint filed in said cause, and to each and every paragraph thereof, separately and severally, and assigns the following separate and several grounds, to-wit:

1. The complaint fails to state a cause of action.
2. The complaint fails to allege, with certainty, the amount actually claimed in this suit.
3. The complaint does not state when the account was incurred.
4. The complaint does not allege for what purpose the account was incurred.

Kenneth Cooper
Attorney For Defendant

Attorney For Plaintiff:

Hon Phyllis S. Nesbit
Attorney At Law
Robertsdale, Alabama

FILED

MAR 3 1964

ALICE L. DUCK, CLERK
REGISTER