

JAMES W. HOWELL
ATTORNEY AT LAW
FOLEY, ALABAMA 36535

POST OFFICE BOX 206

AREA CODE 205-943-3602

August 31, 1965

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

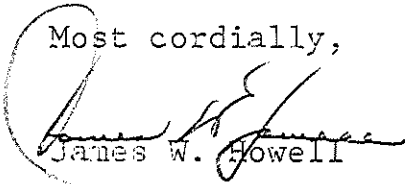
Re: Hance vs Montgomery
Case No. 6237

Dear Mrs. Duck:

For the plaintiff, please dismiss the above
suit and send me a cost bill.

Thank you.

Most cordially,


James W. Howell

JWH:j

JAMES A. BRICE
ATTORNEY AT LAW
BOX 298 • FOLEY, ALABAMA • WH3-3601

M E S S A G E

TO

Mrs. Alice Duck
Bay Minette, Alabama

DATE

10-13-64

Dear Mrs. Duck:

Would you please fill out the summons
for these two suits. Please mail me some
blank summons as I find the office without
any.

With best wishes to you and Eunice.

Sincerely,

BY

SIGNED

R E P L Y

DATE

6236

6237

JERRY HANCE, Individually & D/B/A)
Magnolia Garage,)
PLAINTIFF)
VS)
J.M. Montgomery,)
DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 6237

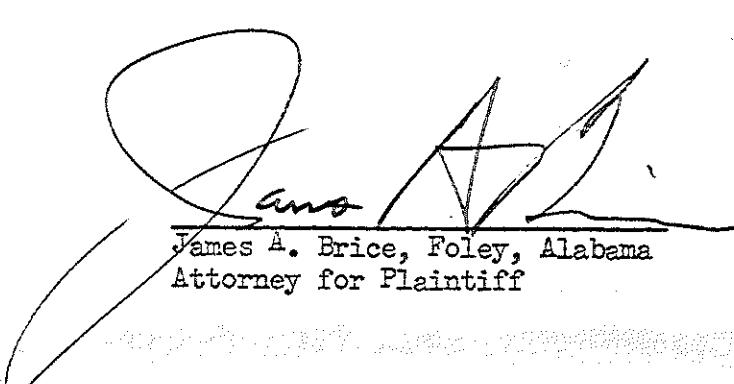
COMPLAINT

The Plaintiff claims of the Defendant One Hundred Sixty-Two Dollars and Eight Cents (\$162.08), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 15th day of February 1964, which sum of money, with the interest thereon, is still unpaid.

FILED

OCT 13 1964

ALICE J. DUCK, CLERK
REGISTER


James A. Brice, Foley, Alabama
Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

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 J.M. Montgomery

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.....

.....J.M. Montgomery....., Defendant.....

byJERRY HANCE, Ind. & d/b/a Magnolia Garage.....

....., Plaintiff.....

Witness my hand this.....13th.....day of.....October.....1964.....

.....Alice J. Duck..... Clerk

No. 6237

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JERRY HANCE, Ind. & d/b/a

Magnolia Garage,

Plaintiffs

vs.

J.M. MONTGOMERY

Loyley

Defendants

SUMMONS AND COMPLAINT

Filed October 13, 19 64

Alice J. Duck Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

10/14 19 64

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

J. M. Montgomery

~~This is a writ and not a return and if~~
~~presented to me in my county I would ac-~~
~~cept same.~~

TAYLOR WILKINS, Sheriff

BY 16 Oct 1964
Returned 16 day of Oct 19 64

Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff

BY W. O. Gentry
Deputy Sheriff

Sheriff

Deputy Sheriff

JERRY HANCE IND. &
d/b/a MAGNOLIA GARAGE

PLAINTIFF

VS

G. T. MONTGOMERY

DEFENDANT

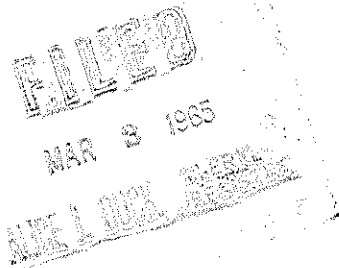
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

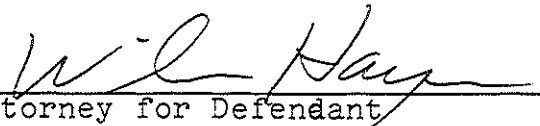
AT LAW

NUMBER: 6237

Comes now the Defendant and for answer to Plaintiff's
complaint says:

1. The matters alleged therein are untrue.





Attorney for Defendant

JERRY HANCE, individually and	)	IN THE CIRCUIT COURT OF
a/b/a MAGNOLIA GARAGE,	)	
	)	BALDWIN COUNTY, ALABAMA
PLAINTIFF,	)	
	)	
vs	)	
	)	
J. M. MONTGOMERY,	)	
	)	
DEFENDANT.	)	AT LAW, NO. 6237

AMENDED COMPLAINT

Now comes the Plaintiff in the above styled cause and amends the caption of said complaint to read as follows:

JERRY HANCE, individually)	)	IN THE CIRCUIT COURT OF
and d/b/a MAGNOLIA GARAGE)	)	
	)	BALDWIN COUNTY, ALABAMA
PLAINTIFF	)	
	)	
vs.	)	
	)	
G. T. MONTGOMERY	)	
	)	
DEFENDANT	)	AT LAW, NO. 6237

64-2-19-65


 James W. Howell
 Attorney for Plaintiff

FILED
 FEB 15 1965
 BALDWIN COUNTY, ALA.

No. 6237

Jerry Hance

vs.

G. T. Montgomery

Lafley

Received 15 day of Feb 1965
and on 19 day of Feb 1965
I served a copy of the within & etc
on G. T. Montgomery
By service on _____

TAYLOR WILKINS, Sheriff
By W. C. Hance
Lafley

Sheriff claims 40 miles at
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
BY W. C. Hance
DEPUTY SHERIFF

76379

No. 6237

Jerry Hance

vs.

G. T. Montgomery

Lafayette

Received 15 day of Feb. 1965
and on 19 day of Feb. 1965
I served a copy of the within & etc
on G. T. Montgomery

By service on _____

TAYLOR WILKINS, Sheriff

By W. D. Williams, S.

Lafayette

Sheriff claims 40

miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY

W. D. Williams
DEPUTY SHERIFF

76379