

ERNEST LANGHAM,

PLAINTIFF,

-VS-

JO-JOHN MANUFACTURING COMPANY)  
a Co-Partnership composed of )  
JOHN CONWAY and JIMMY KEITH, )  
DEFENDANTS )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 6240

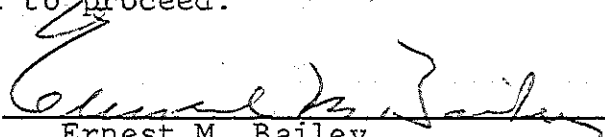
PLEA AND ABATEMENT

Comes now JOHN CONWAY and JIMMY KEITH, Defendants in the title cause, by and through their Attorney, and appear solely and specifically for the purpose of filing this plea and for no other purpose, and pleading in abatement, says:

1.

That they are stockholders in Jo-John Toy Manufacturing Company, Inc., a corporation organized and existing under the laws of the State of Alabama, with its principal place of business in Barnwell, Baldwin County, Alabama; that at no time were they a co-partnership d/b/a Jo-John Manufacturing Company; that at no time mentioned in the complaint were they a co-partnership d/b/a Jo-John Manufacturing Company.

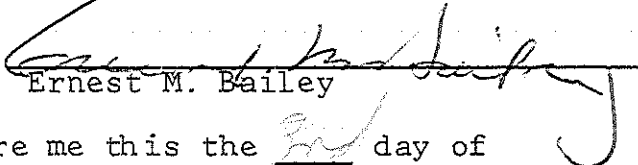
Wherefore, Defendants say that this suit should be abated as to them and should not be allowed to proceed.

  
Ernest M. Bailey,  
Attorney for the Defendants

STATE OF ALABAMA )

COUNTY OF BALDWIN )

Before me, the undersigned authority, a Notary Public in and for said County in said State, personally appeared Ernest M. Bailey, who being duly sworn, deposes and says that he is the Attorney for the Defendants in the above and title cause, and has personal knowledge of the facts stated in the foregoing plea and that the said statements of fact therein contained are true.


  
Ernest M. Bailey

Sworn and subscribed to before me this the 3rd day of November, 1964.

**FILED**

N 5-44

ALICE L. DUCK, CLERK  
REGISTER

  
Notary Public,  
State of Alabama at Large

PLEA AND ABATEMENT

ERNEST LANGHAM,

Plaintiff

-vs

JO-JOHN MANUFACTURING  
COMPANY, a Co-Partnership  
composed of JOHN CONWAY &  
JIMMY KEITH

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW  
CASE NO. 6240

FILED

NOV 5

ALICE J. DICK, CLERK  
REGISTER

FROM

John L. Jackson  
 1017 1/2 D St. N.W.  
 Rm. 412  
 112 Capitol Mall  
 Raleigh, N.C.

Message  
 Reply

DATE:

JUN 17, 1961

PRIORITY

- ☐ URGENT!  
☐ SOON AS POSSIBLE  
☐ NO REPLY NEEDED

FILE NO:

ATTENTION:

SUBJECT:

Re: Jackson vs. Jackson, et al., et al.

TO

Mrs. Alice Lee  
 Clerk, Circuit Court  
 Bay Minette, Ala.

MESSAGE

Enclosed please find original of 10 pages of bill of  
 Complaint for filing and service.

SIGNED:

DATE OF REPLY:

REPLY TO:

John L. Jackson

SIGNED:

REPLY



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 Jo-John Manufacturing Company, a  
Co-Partnership composed of JOHN CONWAY and JIMMY KEITH,

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.....Jo-John  
Manufacturing Company, a Co-Partnership composed of JOHN CONWAY and  
JIMMY KEITH,....., Defendant.S...

by ERNEST LANGHAM.....

..... Plaintiff.....

Witness my hand this.....15.....day of.....Oct.....19<sup>64</sup>.....

EX-10-16-64

.....Deane J. Smith..... Clerk

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No. 6240

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ERNEST LANGHAM

Plaintiffs

vs.

JO-JOHN MANUFACTURING COMPANY,  
a Co-Partnership composed of  
JOHN CONWAY and JIMMY KEITH

Defendants

SUMMONS AND COMPLAINT

Filed FILED 19.....

OCT 15 1964

..... Clerk

ALICE J. DUCK, CLERK  
REGISTER

Ernest T. Lacey

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
JO-JOHN MANUFACTURING COMPANY  
Highway #98, Barnwell, Ala.

Received In Office

10/15 1964  
Taylor Wilkins Sheriff

I have executed this summons

this Oct 16 1964

by leaving a copy with

John Conway  
Jimmy Keith

Sheriff claims 200 miles

Ten Cents per mile Total \$ 20.00

TAYLOR WILKINS, Sheriff

BY

RP  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Roy Randall Deputy Sheriff