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:

l.

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-partner-ship 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. Bailev

Sworn and subscribed to before me this the Aday of November, 1964.

FILED

Notary/Public, State of Alabama at Large

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ERNEST LANGMAM,

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



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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

700.67-47

Plaintiff claims of the Defendants the sum of THREE HUNDRED NINETY TWO AND 50/100 (\$392.50) DOLLARS for work and labor done for the Defendants by the Plaintiff from on, to-wit: the 22nd day of July, 1964 until, on, to-wit: the 21st day of August, 1964 at their request, which sum of money, with the interest thereon, is still unpaid.

ATTORNEYFFOR PLAINTUFF

The Defendants can be served at Jo-John Manufacturing Company, Highway #98, Barnwell, Alabama.



Circuit Court, Baldwin	County
STATE OF ALABAMA No	
BALDWIN COUNTY	TERM, 19
TO ANY SHERIFF OF THE STATE OF ALABAMA:	
You Are Hereby Commanded to SummonJo-John Manufacturing Co	mpany, a
Co-Partnership composed of JOHN CONWAY and JIMMY KEITH,	Juliana de la compania del compania de la compania del compania de la compania del la compania de la compania d
to appear and plead, answer or demur, within thirty days from the service hereof, to the	ne complaint filed
in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against Manufacturing Ckmpany, a Co-Partnership composed of JOHN	
JIMMY KEITH,	Defendant.S
by ERNEST LANGHAM	<del>.</del>
	Plaintiff
Witness my hand this /5 day of 0t 1964	
EV-10-16-64	1Ch. Clerk

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No. 6240	Page
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CIRCUI	T COURT
ERNEST LA	NGHAM
	Plaintiffs
	vs.
	FACTURING COMPANY
	ship composed of and JIMMY KEITH
	Defendants
-	ND COMPLAINT
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ALKE J. DUCK,	2 1964 Clerk CLERK REGISTER
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and the second s	Plaintiff's Attorney

Defendant's Attorney

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

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