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R E P L Y		DATE OF REPLY:	7	REPLY TO:	
And a second sec	RECIPIENT: WRITE REPLY, RE		<u>s</u>	SIGNED:	

W. J. RAYBORN,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
MR. & MRS. CHARLES W. DAVIS, jointly and severally,)	720.6242
Defendants.)	

COUNT I

Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY AND NO/100 (\$150.00) DOLLARS for work and labor done for the Defendants by the Plaintiff from on to-wit: the 10th day of April, 1962 on to-wit: the 11th day of April, 1962, at their request, which sum of money with the interest thereon, is still unpaid.

Attorneys for Plaint Aff

The Defendants can be served at Fairhope Avenue, Fairhope, Alabama.



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 SummonMR. & MRS. CHARLES W. DAVIS
·
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
MR. & MRS. CHARLES W. DAVIS Defendant
by W. J. RAYBORN
Plaintiff
Witness my hand this 9 day of 1964
Ex-10-22-64 Which Much Clerk

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STATE OF ALABAMA Baldwin County

CIRCUIT COURT

W. J. RAYBORN

Plaintiffs

vs.

MR. & MRS. CHARLES W. DAVIS

Defendants

SUMMONS AND COMPLAINT

Filed TULL 19

Cle

John V. Duck

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at Fairhope A_Venue Fairhope, Alabama

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Janko William Sheriff						
Reg Randall Deputy Sheriff						

W. J. RAYBORN,

Plaintiff,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

MR. & MRS. CHARLES W. DAVIS,

jointly and severally,

Defendants.

ANSWER

Come the Defendants in the above styled cause separately and severally and in answer to the Bill of Complaint heretofore filed therein, state that the allegations of the Complaint are untrue.

For further answer the Defendant, Charles W. Davis, shows that the Plaintiff is indebted to him in the sum of One Hundred Sixty-four and 50/100 Dollars (\$164.50) for work and labor done by the said Charles W. Davis for the Plaintiff on the dates as shown on the attached itemized list, which sum of money with the interest thereon is still unpaid and which the Defendants hereby offer to set off against the demand of the Plaintiff, and the Defendant, Charles W. Davis, claims judgment for the excess.

Attorney for Defendants

NOV 10 1924

LIE I DAN, CLERK REGISTER.

Work and labor done by the Defendant, Charles W. Davis for the Plaintiff, W. J. Rayborn on the dates shown

Jan.	20,	1964	Helping to put track on dozer	\$ 36.00
Mar.	22,	1964	Pull track and sprocket on dozer	36.00
Apr.	5,	1964	Pull Sprocket on dozer	36.00
June	8,	1963	Moved underground gas tank	15.00
Apr.	7,	1962	Work freeing dozer which was stuck	13.50
June		1963	Work done on low-boy trailer	10.00
Feb	16,	1963	Work freeing dozer stuck in bog	 18.00