



ERNEST LANGHAM,

Plaintiff

-vs-

JO-JOHN MANUFACTURING COMPANY,  
a corporation,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 6240

6323

Comes now the Defendant and files its answer to the Bill  
of Complaint heretofore filed in this cause and says:

1. It denies the allegations contained in the Bill of  
Complaint and demands strict proof thereof.

FILED

FEB 22 1966

ALICE L. DOWD, CLERK  
REGISTER

*Ernest M. Biber*  
Attorney for Defendant

*file  
in bank  
7/11/11*

ERNEST LANGHAM,

Plaintiff

-vs-

JO-JOHN MANUFACTURING COMPANY,  
a corporation,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

CASE NO. 6240

ERNEST LANGHAM,

Plaintiff

VS

JO-JOHN MANUFACTURING COMPANY, )  
a Corporation

Defendant

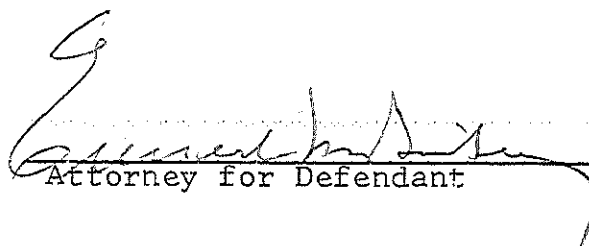
)  
) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA

AT LAW  
63-23  
NO: 6240

MOTION TO SET ASIDE JUDGMENT

Comes now the Defendant in the above styled cause and moves to the Court to set aside the judgment previously rendered in this cause and for reason therefor says as follows:

1. The Plaintiff was awarded a judgment by default and the defendant had filed answer to the bill of complaint denying the allegations thereof.

  
Attorney for Defendant

FILED

JUN 20 1965

ALICE J. DICK, CLERK  
REGISTER

ERNEST LANGHAM,

Plaintiff

VS

JO-JOHN MANUFACTURING CO.,  
a Corporation,

Defendant

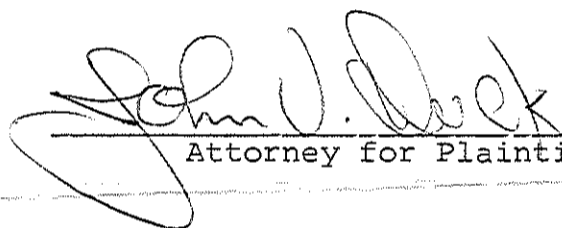
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO: 6240

ERNEST LANGHAM,	)	IN THE CIRCUIT COURT OF	
Plaintiff,	)	BALDWIN COUNTY, ALABAMA	
vs.	)	AT LAW	NO. <del>6240</del> 6373
JO-JOHN MANUFACTURING COMPANY,	)		
a corporation,	)		
Defendant.	)		

Plaintiff claims of the Defendant the sum of THREE HUNDRED NINETY-TWO AND 50/100 (\$392.50) DOLLARS for work and labor done for the Defendant 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.

  
Attorney for Plaintiff

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

**FILED**  
NOV 27 1964

MADE A DUCK, CLERK  
REGISTER

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  
corporation,

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 corporation, Defendant.....

by Ernest Langham

..... Plaintiff.....

Witness my hand this.....27.....day of.....Nov..... 19..64

Heidi J. - [Signature] Clerk

241-21-65

No. 6323

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ERNEST LANGHAM

Plaintiffs

vs.

JO-JOHN MANUFACTURING COMPANY,

a corporation,

Defendants

SUMMONS AND COMPLAINT

Filed 11-27 1964

W. C. Duck Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
Jo-John Manufacturing Company  
Highway #98, Barnwell, Ala.

Received In Office

Nov. 27 1964

Taylor Wilkins Sheriff

I have executed this summons

this Jan 21 1965  
by leaving a copy with

James A. Keith  
Stock Holder

Returned 5 day of Jan 1965  
Not found in my county after diligent search and  
return.

Taylor Wilkins Sheriff  
By Roy Randall

Sheriff's claim 100 Deputy Sheriff

Ten Dollars per day 10.00

By Roy Randall DEPUTY SHERIFF

Taylor Wilkins Sheriff

Roy Randall Deputy Sheriff

Barnwell Ala.