

GULF TELEPHONE COMPANY, : IN THE CIRCUIT COURT OF
Plaintiff, :
Vs. : BALDWIN COUNTY, ALABAMA
C. M. NORTHCUTT, : AT LAW
Defendant. : CASE NO. 6408

ANSWER

Comes now the Defendant in above-styled cause, by his attorney, and for answer to the complaint heretofore filed in this cause, and to each and every count thereof, separately and severally, said that he is not guilty of the matters alleged therein.

Kenneth Cooper
Attorney For Defendant

Attorney For Plaintiff:

Mrs. Phyllis Nesbitt
Attorney At Law
Robertsdale, Alabama

FILED
NOV 4 1965
ALICE A. DICK, CLERK
REGISTER

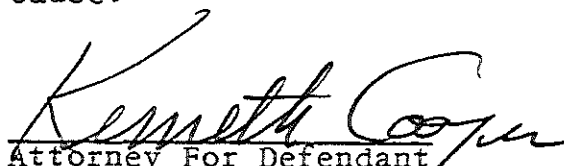
GULF TELEPHONE COMPANY,)	IN THE CIRCUIT COURT OF
PLAINTIFF,)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW
C. M. NORTHCUTT,)	NO. 6408
DEFENDANT.)	

Comes now the defendant in above-styled cause, and demurs to the complainant heretofore filed in this cause, and to each and every count thereof, separately and severally, upon the following grounds; to-wit:

1. The complaint fails to state a cause of action.
2. The complaint is vague.
3. The complaint is indefinite.
4. The complaint does not aver for what cause the alleged sum is due.


 Attorney For Defendant

Defendant demands a
 trial by jury in
 this cause.


 Attorney For Defendant

Attorney of Record For Plaintiff:

Wilters, Brantley & Nesbit

Attorneys At Law

Bay Minette, Alabama

FILED
 MAR 5 1965
 ALICE J. DIXIE, CLERK
 REGISTER

SUMMONS AND COMPLAINT

Moore Prg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 16408

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon C. M. NORTHUTT

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-----

C. M. NORTHUTT

-----, Defendant-----

by-----

GULF TELEPHONE COMPANY

-----, Plaintiff-----

Witness my hand this

22

day of

Feb

1965

Alice J. Duck

Clerk

Executed
Feb. 22, 1965

No. 6408 Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

GULF TELEPHONE COMPANY

Plaintiffs

vs.

C. M. NORTHCUTT

Defendants

Summons and Complaint

Filed _____ 19____

FEB 22 1965

ALICE A. DICK, CLERK
RECEIVED

Clerk

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rosinton, Alabama

Received In Office

Feb. 22 1965

_____, Sheriff

I have executed this summons

this 2/22 1965

by leaving a copy with

C. M. Northcutt

Jayley Wilkins Sheriff

W. O. Garner Deputy Sheriff

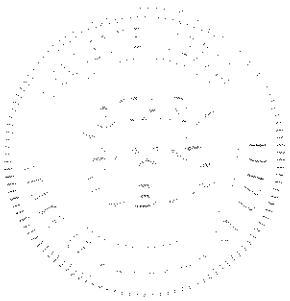
STATE OF Alabama

COUNTY OF Baldwin

Before me, Lourette Ingram, a Notary Public, in
and for said County and State, personally appeared ZONA CROSS,
who being by me duly sworn, deposes and says, that she is Bookkeeper
for the firm of Gulf Telephone Company;
that the annexed statement of the account of said firm against
C. M. NORTHCUTT of Robertsdale, in the State
Alabama, is just, true and correct; that there is now due
on said account the sum of \$ 173.53, after deducting all credits,
set-offs or counter-claims.

X Zona Cross
Sworn to and subscribed before me this 21 day of January,
19 1915.

Lourette Ingram
Notary Public,



GULF TELEPHONE COMPANY

PLAINTIFF

vs

C. M. NORTHCUTT,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6408

1.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SEVENTY-THREE AND 53/100 DOLLARS (\$173.53), due from him by account on the 7th day of October, 1964, which sum of money with the interest thereon, is still unpaid.

2.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SEVENTY-THREE AND 53/100 DOLLARS (\$173.53), due from him by account on, to-wit, October 7, 1964, which sum of money with the interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is attached hereto as Exhibit "A" and made a part hereof.

FILED

FEB 22 1965

ALICE L. DUM, CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

By: Phyllis L. Nesbit

Attorney's for the Plaintiff

6408

7-4200
8.00

TELEPHONE NO. 7-4200
DATE 1-1-57
TAX 1.00
BAL. 1.00

TOLL	RENT	TAX	DIRECTORY ADVERTISING	MISC.	ARREARS	TOTAL	DATE PAID	MO.
2 30	4 30	1 01				7 61		
2 30	4 50	60			99 91	10 71		
4 70	4 50	92			10 32	20 72		
95	4 50	55				6 00		
2 00	4 50	65				7 15		
4 45	4 50	90				9 85		
10 50	4 50	1 00				16 00		
10 35	4 50	2 00				22 94		
12 50	4 50	1 75				19 75		
6 15	8 00	1 00				15 15		
	2 75					27 90		
7 20	8 00	1 52			104 90	121 62		
7 70	8 00	1 57			104 90	122 17		

MOVE, INSTALL EXT & BELL
10 00
TIME & MATERIAL 19 60
34 00

CONNECTED
12-12-57
DISCONNECTED

INSTALLATIONS AND MOVES	
DATE	KIND OF TELEPHONE
12-12-57	Install 1st line
	Install 2nd line
	Install 3rd line
	Install 4th line
	Install 5th line
	Install 6th line
	Install 7th line
	Install 8th line
	Install 9th line
	Install 10th line

7-4200

51 7-4200

TOLL	RENT	TAX	DIRECTORY ADVERTISING	MISC.	ARREARS	TOTAL	DATE PAID	MO.
8 25	8 00	1 63			122 17	140 85*		JAN.
						17 83		
						122 17		
6 70	8 00	1 47			122 17	136 34*		FEB.
8 95	8 00	1 70			138 34	156 89*		MAR.
						16 17		
7 15	8 00	1 52			140 82	157 49*		APR.
9 85	8 00	99			157 49	168 33*		MAY.
4 55	8 00	1 26			168 33	182 14*		JUNE
						50 00	7-5-63	
						132 14		JULY
25		83			102 87	103 15*		AUG.
					103 15	103 15*		SEPT.
					103 15	103 15*		OCT.
					103 15	103 15*		NOV.
					103 15	103 15*		DEC.

CONNECTED

INSTALLATIONS AND MOVES

DISCONNECTED

DATE	KIND OF TELEPHONE
2-1-63	Line from pay #394

TELEPHONE NO.

4-2812

RATE

700

TAX

10 W. 10th St.
Edmonton, Alberta

B. B. A.

TOLL	RENT	TAX	DIRECTORY ADVERTISING	MISC.	ARREARS	TOTAL	DATE PAID	MO.
11 40	4 00	1 34				16 94		JAN.
8 85	4 00	1 20			16 94	31 00		FEB.
8 75	4 00	1 20			31 00	40 11		MAR.
10 35	4 00	1 44				15 79		APR.
6 55	4 00	1 30				14 25		MAY.
15 10	4 00	1 91				21 01		JUNE.
12 70	4 00	1 87				18 37		JULY.
10 30	4 00	1 43		WIRE 4 05		19 78		AUG.
9 70	4 00	1 37				15 07		SEPT.
14 70	7 00	2 17		10 00		33 87		OCT.
	2 50	25		TIME & MATERIAL 00 90		156 52		NOV.
12 60	7 00	1 96			99 90	121 46		DEC.
5 25	7 00	1 23			99 90	113 38		

CONNECTED

9-29-48

DISCONNECTED

INSTALLATIONS AND MOVES

DATE	KIND OF TELEPHONE
7-25-48	Single line

40812

C. M. Marshall
Robertsdale, Alabama

701-2012

TOLL	RENT	TAX	DIRECTORY ADVERTISING	MISC.	ARREARS	TOTAL	DATE PAID	MO
10 35	7 00	2 62			115 30	142 15	1-22-63	JAN.
4 05	7 00	1 11			112 20	123 36		FEB.
11 30	7 00	1 00			125 34	145 67	3-27-63	MAR.
6 40	7 00	1 34			130 34	148 20	5-1-63	APR.
2 80	7 00	30			135 31	144 40	5-27-63	MAY
1 30	7 00	30			135 31	143 30	7-1-63	JUNE
7 10	7 00	1 41			144 25	150 76	7-5-63	JULY
10 30	7 00	1 73			144 25	152 28	7-25-63	AUG.
11 30	7 00	1 00			144 25	152 28	9-3-63	SEP.
					144 25	152 28	9-27-63	OCT.
16 25	7 00	2 20			144 25	155 70	10-14-63	NOV.
4 35		44			144 25	155 70		DEC.

CONNECTED

DISCONNECTED

INSTALLATIONS AND MOVES

DATE	KIND OF TELEPHONE
10-21-62	Home Phone

cm Northcutt

NAME

TAX

D. A.

TOLL	RENT	TAX	DIRECTORY ADVERTISING	MISC	APREARS	TOTAL	DATE PAID	NO
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05 30 05 30

05 30 05 30

05 30 05 30

05 30 05 30

05 30 05 30

8-5-64

10-7-64

CONNECTED

DISCONNECTED

INSTALLATIONS AND MOVES

DATE

KIND OF TELEPHONE