GULF TELEPHONE COMPANY,

IN THE CIRCUIT COURT OF

Plaintiff,

BALDWIN COUNTY, ALABAMA

Vs.

AT LAW

C. M. NORTHCUTT,

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.

Attorney For Plaintiff:

Mrs. Phyllis Nesbitt Attorney At Law Robertsdale, Alabama

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 of Record For Plaintiff:

Wilters, Brantley & Nesbit

Attorneys At Law

Bay Minette, Alabama



Plaintiff___

SUMMONS AND COMPLAINT	Moore Ptg. Co.
The State of Alabama, Baldwin County. Circuit Court, Baldwin No. 1940	*
TO ANY SHERIFF OF THE STATE OF ALABAMA:	
You Are Hereby Commanded to SummonC. M. NORTHCUTT	
to appear and plead, answer or demur, within thirty days from the service hereof, to the the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against	-
C. M. NORTHQUTT	, Defendant

day of Jel

No. 6408 Page		Defendant lives at
The State of Alabama Baldwin County		Rosinton, Alabama
CIRCUIT COURT	*	Received In Office
	State of the state	Tel. 22 1405
GULF TELEPHONE COMPANY Plaintiffs		I have executed this summons this 2/22 1960
vs.		by leaving a copy with C. M. Parthoult
C. M. NORTHCUTT Defendants		C.M. Franch-Cull
Summons and Complaint		
Filed191919		
Clerk		
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WILTERS, BRANTLEY & MESBIT		Y 1 and
Plaintiff's Attorney	*	Layler Mulsino Sheriff W.O. Harnes Deputy Sheriff
Defendant's Attorney		Deputy Sheriff

STATE OF Clabama
COUNTY OF <u>Boldevin</u>
Before me, Lougette Ingan, 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
Clahama, 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 Jona Cross
Sworn to and subscribed before me this 2/ day of January,
19/65-
Lewette Ingrand Notary Public.
Notary Public,

GULF TELEPHONE COMPANY	X	IN THE CIRCUIT COURT OF
PLA INT IFF	X	BALDWIN COUNTY, ALABAMA
νs	Ž	AT LAW
C. M. NORTHCUTT,	Ž	770 / //88
DEFENDANT	X	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.

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WILTERS, BRANTLEY & NESBIT

By: Thilles /

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