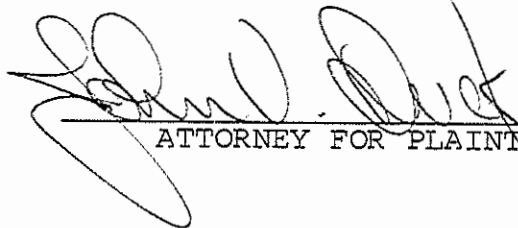


LACY B. WELCH,)
Plaintiff,)
-vs-)
HENRIETTA DeGRAF,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW 6514

COUNT ONE

Plaintiff claims of the Defendant the sum of THREE HUNDRED FORTY-ONE AND 20/100 (\$341.20) DOLLARS for work and labor done by the Plaintiff for the Defendant from on, to-wit: the 18th day of July, 1964 until on, to-wit: the 22nd day of March, 1965, at her request, which sum of money, with the interest thereon is still unpaid.


ATTORNEY FOR PLAINTIFF

FILED

14-1965

151 300 1000 13

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 HENRIETTA DeGRAF

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.....

.....HENRIETTA DeGRAF....., Defendant.....

by LACY B. WELCH.....

....., Plaintiff.....

Witness my hand this 14 day of May 1965

EX-5-14-65 [Signature] Clerk

No. 6514

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

LACY B. WELCH

Plaintiffs

vs.

HENRIETTA DeGRAF

Defendants

SUMMONS AND COMPLAINT

Filed 5-14 1965

Cliff Welch Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robertsdale, Alabama on
Hwy. 90 near Knights Grocery

RECEIVED
Received In Office

MAY 14 1965 19.....

TAYLOR WILKINS Sheriff

I have executed this summons

this May 14 1965

by leaving a copy with

Henrietta De Graf

Sheriff claims 50 miles at

Ten Cents per mile Total 5.00

TAYLOR WILKINS Sheriff
BY Charles Children
DEPUTY SHERIFF

Taylor Wilkins Sheriff
Charles Children Deputy Sheriff

R. Duck

DUCK & LACEY
Attorneys at Law
P. O. DRAWER A-J - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

P. O. Box 239

Bay Minette, Ala.

DATE May 13, 1965

Re: LACY B. WELCH VS. HENRIETTA DeGRAF

Dear Mrs. Duck:

710.6514

Enclosed you will find a Bill of Complaint
to be filed in above case together with
copy of same and Summons to be served.

Sincerely,

SIGNED

John T. Duck

DATE

5-14-65

SIGNED

LACY B. WELCH,

PLAINTIFF

vs

HENRIETTA DeGRAAF,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

Comes now the Defendant in the above styled cause and for answer to Complaint says as follows:

1.

The allegations of the Plaintiff are untrue.

2.

The Defendant as a defense to the action of the Plaintiff saith that, at the time said action was commenced, the Plaintiff was indebted to her in the sum of \$400.00, for rent from to-wit: July 10, 1964, to May 10, 1965, which she hereby offers to set off against the demand of the Plaintiff "and she claims judgments for the excess."

WILTERS, BRANTLEY & NESBIT

By: Phyllis S. Nesbit

Attorney for Defendant

Defendant demands a trial by jury

WILTERS, BRANTLEY & NESBIT

BY: Phyllis S. Nesbit

NO. 6514

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

LACY B. WELCH,

PLAINTIFF

VS

HENRIETTA DeGRAAF,

DEFENDANT

ANSWER

FILED
MAY 20 1935
CLERK

JOHN V. DUCK
Fairhope, Alabama
Plaintiff's Attorney

WILTERS, BRANTLEY & NESBIT
Robertsdale, Alabama
Defendant's Attorney

WILTERS, BRANTLEY & NESBIT
ROBERTSDALE, ALABAMA

6514