GIBBONS & STOKES

ATTORNEYS AT LAW
160 CONGRESS STREET
MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS B. F. STOKES, III

October 25, 1967

MAILING ADDRESS P. O. BOX 293 MOBILE, ALABAMA, 36601

Mrs. Alice Duck, Clerk Circuit Court Baldwin County Bay Minette, Alabama

Re: Weeks Wholesale Rose Grower vs. Grimes Nursery, Circuit Court case #6788

Dear Mrs. Duck:

It is my understanding that the attorney representing Mr. Grimes has withdrawn his representation and since this suit is on an itemized verified account with no sworn denial, I would appreciate your bringing this to the Court's attention and requesting a judgment on the itemized verified account in the sum of \$250.00, which is the balance owed by Mr. Grimes.

I presume that the attorney formerly representing the defendant informed him of his withdrawal, and it seems reasonable to me that sufficient time has elapsed for the defendant to get another attorney if he so desires.

This is not a jury matter and it is my understanding that in default situations such as this, or in judgment nil dicit situations such as this, the Court has indicated that it would go ahead and render the judgment without the lawyer coming over to Baldwin County.

If the Court desires that I come over, I will be happy to do so if you will inform me.

Sincerely,

É. Graham Gibbons

EGG: he

GIBBONS & STOKES

ATTORNEYS AT LAW

201 AMERICAN NATIONAL BANK BUILDING

BIENVILLE OFFICE

MOBILE, ALABAMA

E. GRAHAM GIBBONS B. F. STOKES, III TELEPHONE 433-2611

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA, 36601

December 13, 1965

Mrs. Alice Duck Clerk, Circuit Court of Baldwin County, Ala. Bay Minette, Alabama

Re: Weeks Wholesale Rose Grower

Vs: Grimes Nursery

Dear Mrs. Duck:

I would appreciate your filing the above-captioned matter in the Circuit Court of Baldwin County and advising me of the case number.

As I have indicated on the complaint, I will guarantee, personally, security for costs in this matter.

Sincerely,

EGG:bg

E. GRAHAM GIBBONS

Encl:

O. L. WEEKS, doing business as WEEKS WHOLESALE χ. ROSE GROWER, Plaintiff, χ,, IN THE CIRCUIT COURT OF . Х BALDWIN COUNTY, ALABAMA vs. χ CASE NO.6788 AT LAW BOB GRIMES, doing business as GRIMES NURSERY, χ Defendant. χ

PLEA

Comes now the Defendant in the above styled cause by and through his attorneys and for plea to the complaint and to each and every count thereof, separately and severally, heretofore filed against him in the above styled cause pleads separately and severally as follows:

1. The allegations of the complaint are untrue.

CHASON, STONE & CHASON

By John Earle Cheur

4 Y 2 1966

CERTIFICATE OF SERVICE

:)

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 2 day

of News, 1966 John Earle Cheson

O. L. WEEKS, doing business as WEEKS WHOLESALE ROSE GROWER,

Plaintif ,

VS.

BOB GRIMES, doing business as GRIMES NURSERY,

Defendant.

* * * * * * * * * * * * * * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

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AT LAW CASE NO. 5788

PLEA

O. L. WEEKS d/b/a IN THE CIRCUIT COURT WEEKS WHOLESALE ROSE GROWER)

OF BALDWIN COUNTY,

Plaintiff,

ALABAMA

VS.

BOB GRIMES d/b/a

GRIMES NURSERY,

Defendant.

CASE NO. 4788

COUNT I

Plaintiff claims of defendant the sum of \$300.00 due from him by account on June 1, 1964, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized verified account which will be offered in evidence.

COUNT II

plaintiff claims of defendant the sum of \$300.00 due from him by account on June 1, 1964, which sum of money with the interest thereon, is still unpaid.

COUNT III

Plaintiff claims of defendant the sum of \$300.00 due from him on account stated between the plaintiff and defendant on, to-wit, June 1, 1964, which sum of money, with the interest thereon, is still unpaid.

ATTORNEY FOR PLAINTIFF

Serve the defendant at:

P. O. Box 277 Stapleton, Alabama

The plaintiff, being a non-resident of the State of Alabama, I will guarantee, personally, cost incident to this suit, as security therefore.

DEC 14 1985 AUG 1 UUM REGISTER

GIBBONS & STOKES

By: E. GRAHAM GIBBONS

Attorney for the Plaintiff

O. L. WEEKS

NURSERY HDQ, AND GROWING GROUNDS

926 W. PHILADELPHIA - ONTARIC, CALIFORNIA 91762

TELEPHONE 714 YUKON 4-2709



MEMBER:
ALL AMERICA ROSE SELECTIONS
AMERICAN ASS'N OF NURSERYMEN
CALIFORNIA ASS'N NURSERYMEN

WHOLESALE ROSE GROWER BUSHES - CLIMBERS - TREE ROSES

December 26, 1963

. Grimes Mursery P. O. Box 277 Stapleton, Alabama

C O P I

STATEMENT OF ACCOUNT			
Attached Invoice No. 63706		2	70
Attached Invoice No. 63282		710	40
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OTHER CHARGES: Boxing 5 lg @ 3.25, l sm @ .65¢		16	90
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	TOTAL	740	20
CREDIT			
	TOTAL DUE	740	20

Discount of 14.26 applies if paid within 15 days from date of withdrawal from warehouse

NET-30 DAYS



ROSES "California Grown - - Quality Known"

DUPLICATE INVOICE

63706

Weeks Wholesale Rose Grower

Ontario, California

926 West Philadelphia

Phone: YUkon 4-2709

. GRIMES NURSERY P. O. BOX 277 STAPLETON, ALABAMA

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ROSES

"California Grown - - Quality Known"

DUPLICATE INVOICE

Weeks Wholesale Rose Grower

926 West Philadelphia Phon

Phone: YUkon 4-2709

Ontario, California

DATE	

63282

GRIMES NURSERY P. O. BOX 277 STAPLETON, ALABAMA

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ROSES "California Grown - - Quality Known"

DUPLICATE INVOICE

63282

Weeks Wholesale Rose Grower

O. L. WEEKS

926 West Philadelphia

Phone: YUkon 4-2709

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ROSES
"California Grown - - Quality Known"

DUPLICATE INVOICE

Weeks Wholesale Rose Grower

O. L. WEEKS

926 West Philadelphia

Phone: YUkon 4-2709

Ontario, California

DATE	

63282

GRIMES NURSERY

3

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COUNTY OF San Bernardino	* · · :
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Be it remembered, that on this 6th day of July	
A. D., 19.65, personally appeared before me, the undersigned autho	rity,
O.L. Weeks	known to me
who being duly sworn, upon his oath stated that he is	***************************************
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and has been duly authorized by said corporation to make this wife	žavit:
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a sole trader doing business as works where the sole trader doing business as well as the sole trader doing business as the sole trader doing bu	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
and that as such he makes this affidavit; that he is familiar with the said Weeks Wholesale Rose Grower ; that the Grimes Nursery of Staploton, Alabar	he books and business of
Grimes Nursery 4 Stanloton Alabar	e attached account against
is first and correct within the land. I de 11: 00	na
is just and correct, within the knowledge of this affiant, that the item	is thereon stated and com-
posing the said account were sold and delivered to said Grimes Num	rsery
at * special instance and request, that credit has been duly g	given for all payments and
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remains unpaid.	is justly due and
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I hereby certify under my official seal that I am authorized as a Notary Public to	·
administer oaths under the laws of the State of Albahana	
and that the foregoing was subscribed and sworn to before me on the day and year	
first above stated.	

Notary Public

STATE OF ALABAMA Baldwin County No6788 TO ANY SHERIFF OF THE STATE OF ALABAMA: Bob Grimes, d/b/a Grimes Nursery You Are Hereby Commanded to Summon	19
TO ANY SHEDIFF OF THE STATE OF ALABAMA:	19
TO ANY SHERIFF OF THE STATE OF ALABAMA: Bob Grimes, d/b/a Grimes Nursery	
TO ANY SHERIFF OF THE STATE OF ALABAMA: Bob Grimes, d/b/a Grimes Nursery	
Bob Grimes, d/b/a Grimes Nursery	
You Are Hereby Commanded to Summon	
to appear and plead, answer or demur, within thirty days from the service hereof, to the comp in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against	
Bob Grimes, d/b/2 Grimes Nursery Defe	endant
O. L. Weeks, d/b/a Week's Wholesale Rose Grower	
Dy	
P	laintiff
Witness my hand this	
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Defendant's Attorney

Defendant lives at DEC 14 1965 TAYLOR WILKINS Sheriff I have executed this summons this Dec 20 1965 by leaving a copy with