

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 Grimes has withdrawn his representation and since this suit is on an itemized verified account with no sworn denial, I would appreciate your bringing this to the Court's attention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,


E. Graham Gibbons

EGG:he

GIBBONS & STOKES

ATTORNEYS AT LAW

201 AMERICAN NATIONAL BANK BUILDING

BIENVILLE OFFICE

MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS
B. F. STOKES, III

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,



E. GRAHAM GIBBONS

EGG:bg

Encl:

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

Plaintiff,

vs.

BOB GRIMES, doing business
as GRIMES NURSERY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW CASE NO. 6788

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 Chason

FILED

MAY 2 1966

AME I. MUI, CLERK
REGISTER

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 May, 1966

John Earle Chason

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

Plaintiff,

vs.

BOB GRIMES, doing business as
GRIMES NURSERY,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. ⁴⁷⁸⁸~~5788~~

* * * * *

PLEA

* * * * *

O. L. WEEKS d/b/a
WEEKS WHOLESALE ROSE GROWER

Plaintiff,

VS.

BOB GRIMES d/b/a
GRIMES NURSERY,

Defendant.

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

AT LAW

CASE NO. 4788

COUNT I

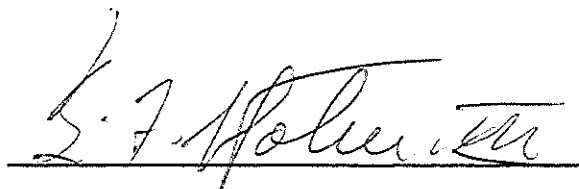
Plaintiff claims of defendant the sum of \$300.00 due from him by account on June 1, 1964, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized verified account which will be offered in evidence.

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.

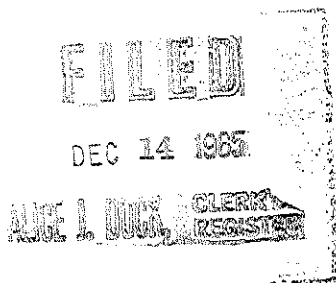


ATTORNEY FOR PLAINTIFF

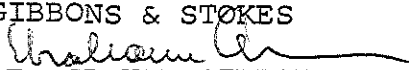
Serve the defendant at:

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.



265

GIBBONS & STOKES

By: E. GRAHAM GIBBONS
Attorney for the Plaintiff

O. L. WEEKS

NURSERY HDQ. AND GROWING GROUNDS

926 W. PHILADELPHIA - ONTARIO, CALIFORNIA 91762

TELEPHONE 714 YUKON 4-2709

WEEKS

MEMBER:

ALL AMERICA ROSE SELECTIONS
AMERICAN ASS'N OF NURSEYMEN
CALIFORNIA ASS'N NURSEYMEN

WHOLESALE ROSE GROWER
BUSHES - CLIMBERS - TREE ROSES

December 26, 1963

Grimes Nursery

P. O. Box 277

Stapleton, Alabama

C O P Y

STATEMENT OF ACCOUNT

Attached Invoice No. <u>63706</u>	2	70
Attached Invoice No. <u>63282</u>	710	40
Attached Invoice No. _____		
Attached Invoice No. _____		
Attached Invoice No. _____		
Attached Invoice No. _____		
Attached Invoice No. _____		
OTHER CHARGES: Boxing <u>5 lg @ 3.25, 1 sm @ .65¢</u>	16	90
Warehousing <u>1020 Plants @ .01¢</u>	10	20
Pictures _____		

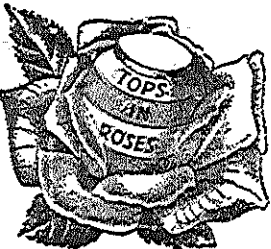
	TOTAL	740 20
CREDIT _____		

	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"
Weeks Wholesale Rose Grower

DUPLICATE INVOICE

63282

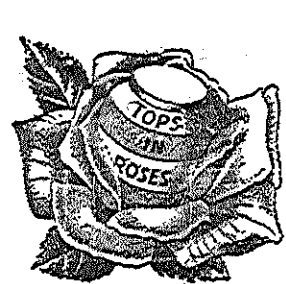
O. L. WEEKS
926 West Philadelphia Phone: YUkon 4-2709 Ontario, California

DATE _____

GRIMES NURSERY
P. O. BOX 277
STAPLETON, ALABAMA

Terms and Conditions of Sale

VARIETY	RETAIL UNIT	NO. 1	NO. 1 1/2	NO. 2	WHOLESALE UNIT	WHOLESALE TOTAL
NON PATENTS						
CHARLOTTE ARMSTRONG						
CRIMSON GLORY						
ETOILE DE HOLLANDE						
MIRANDY						
RED RADIANCE						
EDITOR McFARLAND						
KATHERINE T. MARSHALL						
PINK DAWN						
RADIANCE						
ECLIPSE						
LOWELL THOMAS						
McGREEDY'S YELLOW						
PEACE						
SISTER THERESE						
FRAU KARL DRUSCHKI						
VIRGO						
PRES. HERBERT HOOVER						
TALISMAN		10				
EUTIN		20				
GARNETTE		10				
PINOCCHIO		20				
ROSE ELFE		10				
THE FAIRY		20				
SUMMER SNOW		10				
MARGO KOSTER		10				



ROSES
"California Grown - - Quality Known"

DUPLICATE INVOICE

Weeks Wholesale Rose Grower

63282

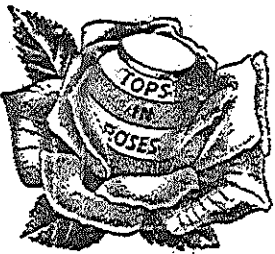
O. L. WEEKS
926 West Philadelphia Phone: YUkon 4-2709 Ontario, California

DATE _____

GRIMES NURSERY

2

VARIETY	RETAIL UNIT	NO. 1	NO. 1½	NO. 2	WHOLESALE UNIT	WHOLESALE TOTAL
NON PATENTS-CONTINUED						
FLORADORA						
CL. BLAZE IMPROVED						
CL. CHARLOTTE ARMSTRONG						
CL. ETOILE DE HOLLANDE						
CL. PAUL'S SCARLET						
CL. CECILE BRUNNER						
CL. NEW DAWN						
CL. RADIANCE						
CL. MRS. E. P. THOM						
CL. SUMMER SNOW						
CL. TALISMAN						
					.50	345.00
PATENTED ROSES						
NON PATENTS NO. 2 GRADE						
CRIMSON GLORY						
ETOILE DE HOLLANDE				10		
MIRANDY				10		
COUNTESS VANDAL				10		
THE DOCTOR				10		
PEACE				10		
VIRGO				10		
				70	.27	18.90



ROSES
"California Grown - - Quality Known"

DUPLICATE INVOICE

Weeks Wholesale Rose Grower

63282

O. L. WEEKS
926 West Philadelphia Phone: YUkon 4-2709 Ontario, California

DATE _____

GRIMES NURSERY

3

VARIETY	RETAIL UNIT	NO. 1	NO. 1½	NO. 2	WHOLESALE UNIT	WHOLESALE TOTAL
PATENTS						
CHRYSLER IMPERIAL	2.50	10			1.40	14.00
HAPPINESS	2.00	10			1.10	11.00
HELEN TRAUBEL	2.75	10			1.50	15.00
SOUTH SEAS	3.50	10			1.85	18.50
TIFFANY	2.75	10			1.50	15.00
TANYA	3.50	10			1.85	18.50
TROPICANA	3.50	20			1.75	35.00
GARDEN PARTY	3.00	10			1.65	16.50
KORDES PERFECTA	2.50	20			1.25	25.00
STERLING SILVER		10				
JOHN S. ARMSTRONG	3.50	10			1.85	18.50
STARFIRE	2.50	10			1.40	14.00
QUEEN ELIZABETH	2.50	10			1.40	14.00
BUCCANEER	2.50	10			1.40	14.00
MONTEZUMA	2.75	10			1.50	15.00
HEAT WAVE	2.75	10			1.50	15.00
VALENTINE	2.25	10			1.25	12.50
SARATOGA	2.50	10			1.40	14.00
SMALL TALK	2.00	10			1.10	11.00
SPARTAN	2.00	10			1.10	11.00
CIRCUS	2.50	20			1.25	25.00
CL. SPECTACULAR	2.50	10			1.40	14.00
						710.40

ALL GROWING GROUNDS ARE LOCATED IN ONTARIO AND CHINO VALLEYS

SEE REVERSE SIDE

COUNTY OF San Bernardino

STATE OF California

Be it remembered, that on this 6th day of July
A. D., 1965, personally appeared before me, the undersigned authority,
O. L. Weeks

known to me
who being duly sworn, upon his oath stated that he is

~~of~~

~~a corporation organized and doing business under the laws of the State of~~
~~and has been duly authorized by said corporation to make this affidavit~~
~~a partnership composed of~~

a sole trader doing business as Weeks Wholesale Rose Grower

and that as such he makes this affidavit; that he is familiar with the books and business of
said Weeks Wholesale Rose Grower

; that the attached account against
Grimes Nursery of Stapleton, Alabama

is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
posing the said account were sold and delivered to said Grimes Nursery

at ~~its~~ ~~their~~ ~~this~~ special instance and request, that credit has been duly given for all payments and

just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of Three Hundred and 00/100 (\$300.00) ----- Dollars
(\$300.00) with interest from June 1 1964 19 is justly due and
remains unpaid.

O. L. Weeks X
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 California
and that the foregoing was subscribed and sworn to before me on the day and year
first above stated.

Notary Public

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6788

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Bob Grimes, d/b/a Grimes Nursery

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.....

Bob Grimes, d/b/a Grimes Nursery, Defendant.....

by O. L. Weeks, d/b/a Week's Wholesale Rose Grower

Plaintiff.....

Witness my hand this 11 day of Dec 19 65

Clerk

No. 6788

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

O. L. WEEKS, d/b/a

WEEKS WHOLESALE ROSE GROWER

Plaintiffs

vs.

BOB GRIMES d/b/a GRIMES NURSERY

Defendants

SUMMONS AND COMPLAINT

Filed 12-14- 19 65

Alice J. Duck Clerk

Gibbons & Stokes

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED
Received In Office

DEC 14 1965 19.....

TAYLOR WILKINS
SHERIFF

I have executed this summons

this Dec 20 19 65

by leaving a copy with

Bob Grimes

Sheriff claims 20 miles at

Ten Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY Deputy Sheriff

Taylor Wilkins Sheriff

W. A. Talbot Deputy Sheriff

10 miles South of R.R.