

LOXLEY TRACTOR COMPANY, INC.,  
A Corporation,

Plaintiff,

vs.

BEN J. BREWER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

DEMURERS

Comes now the defendant in the above styled cause and demurs to the complaint, and separately and severally to each count thereof, and for grounds of demurer, assigns, separately and severally the following:

1. Said Count states no cause of action against the Defendant.

*James C. Hendrix*  
Attorney for Defendant.

3250

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 3250

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

*Bert J. Brewer*

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

*Bert J. Brewer*

Defendant .....

by

*Loyley Tractor Co. Inc. a corp -*

Plaintiff.....

Witness my hand this

*21*

day of

*May*

1957

*Wm. J. Duck*

Clerk

LOXLEY TRACTOR COMPANY, INC.,  
A Corporation,

PLAINTIFF,

VS.

BEN J. BREWER

DEFENDANT,

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

C O M P L A I N T

COUNT ONE

The Plaintiff claims of the Defendant the sum of  
ONE HUNDRED NINETY-FOUR DOLLARS AND FIFTY CENTS (\$194.50)  
due from him by account on, to-wit: the 4th day of October,  
1954, which sum of money, together with interest thereon is  
still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant the sum of  
~~ONE HUNDRED NINETY-FOUR DOLLARS AND FIFTY CENTS (\$194.50)~~  
due from him on an account stated, between the Plaintiff and  
Defendant, on to-wit: the 1st day of November, 1954, which  
sum of money together with interest thereon, is still un-  
paid.

  
Attorney for Plaintiff

NOTE:

The account sued on is evidenced by an itemized and  
verified statement filed herewith.

  
Attorney for Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in said County of said State, personally appeared before me, L. H. Booker, who being duly sworn says that he is Secretary and Treasurer of Loxley Tractor Company, Inc., and that he has personal knowledge of the facts herein stated, and that the attached account is a true and correct statement of the account owed by Ben J. Brewer to Loxley Tractor Company, Inc.

Sworn to and subscribed before me on this the

21 day of May, 1957.

Ruth Cummins  
Notary Public, Baldwin County  
Alabama

A circular notary seal is visible on the right side of the page, partially overlapping the signature line. It contains the text "NOTARY PUBLIC" and "BALDWIN COUNTY ALABAMA" around a central emblem.