

GEORGE B. HALLIDAY,
individually and doing
business as MATTIE RHODES
HOSPITAL,

Plaintiff,

Vs.

LUZELL FERRELL,

Defendant.

*

*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

*

LAW SIDE

*

DEMURRER

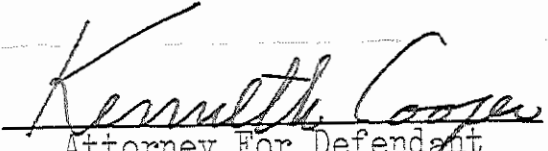
Comes now the Defendant in above-styled cause, by his attorney,
and demurs to the Complaint heretofore filed in this cause, and to
each and every count thereof, separately and severally, and as
grounds therefor assigns the following, separately and severally:

ONE: The Complaint is vague and uncertain.

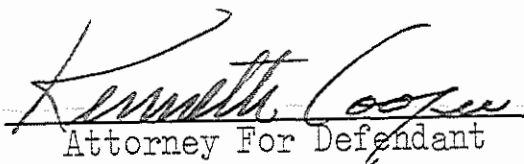
TWO: The Complaint does not state a legal cause of action.

THREE: The Complaint fails to allege what the account was for.

FOUR: The Complaint fails to allege how much interest is due.


Attorney For Defendant

I hereby certify that I have served a copy of the foregoing
Demurrer on Hon. John Earl Chason, Attorney At Law, Bay Minette,
Alabama, by depositing a copy of same in the United States mail at
Bay Minette, Alabama, addressed to him as above indicated by first
class mail, postage prepaid, on this 20 day of July, 1966.


Attorney For Defendant

FILED

JUL 22, 1966

AMEL BUE, CLERK

The State of Alabama
BALDWIN COUNTY

113. 7887

CIRCUIT COURT

To any Sheriff of the State of Alabama—GREETING:

You are hereby commanded, that of the goods and chattels, lands and tenements of George B. Halliday,

Inc., & d/b/a Mattie Rhodes Hospital

Plaintiff

you cause to be made the sum of Thirty and 50/100 - - -

Dollars, costs of suit,

which Luzell Ferrell

Defendant

recovered of the Plaintiff for the use of the officers of said Court, on the 29th day of Sept., 1967,

by the judgment of the Circuit Court, held for the County of BALDWIN, and have the same to render to the Clerk of said Court and make return of this writ and the execution thereof according to law.

Witness my hand, this 20th day of April, 1978

George B. Blackman
Clerk

CLERK'S FEES:

AMOUNT

SUMMARY OF FEES, COSTS AND JUDGMENT:

AMOUNT

1. Suits for \$100.00 or less.....	\$ 6.00
2. Suits for over \$100.00 but less than \$1000	10.00
3. Suits for \$1000.00 and over.....	20.00
4. Suits Detinue, ejectment, etc.....	10.00
5. Suits not otherwise provided for.....	10.00
6. Appeal from Justice of Peace, etc.....	6.00
7. Garnishment on Judgment, etc.....	6.00
8. Workmen's Compensation-Petition Settlement	10.00
9. Appeals from State Dept. of Pub. Safety, etc.....	10.00
10. Motion to sell real estate-J. P. levy.....	6.00
11. Mandamus, writ of prohibition, etc.....	15.00
12. Recording Executions-State Agencies.....	3.00
13. Copy of Record-per 100 words.....	.15
14. Certifying Abstract in transcript.....	5.00
15. Record for Supreme-Appeals Ct. per 100 wds.	.15
16. Additional copies Record-Appeals per 100 wds.	.05
17. Taking Appeal Bond.....	.75
18. Reporter's Transcript on Appeal.....	10.00
19. Appeals Courts Concurrent Jurisdiction	15.00
20. Application-Habeas Corpus	6.00
21.	
22.	
Total Clerk's Fees	

1. Clerk's Fees	20.00
2. Ex-Clerk's Fees	
3. Sheriff's Fees	6.00
4. Ex-Sheriff's Fees	
5. Trial Tax	4 50
6. Court Reporter's Fee, per day.....	5
7. Witness Fees	
8. Commissioner's Fees	
9. Garnishee's Fees	
10. Publisher's Fees	
11.	
12.	
13. Clerk's Fees in Inferior Court	
14. Sheriff's Fees in Inferior Court.....	
15. Witness Fees in Inferior Court.....	
16.	
17. Justice of Peace Fees.....	
18. Constable's Fees	
19.	
20. Cost in Appealed Cases Docketed (Total).....	

TOTAL FEES AND COST

430 50

21.	
22. Judgment	5
23. 10% Damages	5
24. Interest	5

TOTAL JUDGMENT

TOTAL FEES, COST AND JUDGMENT

SHERIFF'S FEES:

23. Serving summons and complaint	\$ 1.50
24. Levying attachment and return	6.25
25. Seizing personal property-Detinue	6.00
26. Approving bond, each	2.00
27. Serving Garnishee-Writ	1.50
28. Serving Sci. Fa. or notice	1.50
29. Serving subpoenas, each	.75
30. Impanelling Jury	.75
31. Serving Contempt Attachment	1.50
32. Collecting execution for cost only.....	1.50
33. Commissions on Execution	
34. Executing Writ of Possession, each	5.00
35. Making Deed to Real Estate sold, each	2.50
36. Mileage, each	.10
37.	
38.	

Total Sheriff's Fees

\$30.50

01997-9087

New Wave

State of Missouri
Circuit Court

JOHN B. HALLIDAY, Ind. & d/a/a

vs:

LUCILE FERRELL

Pl. No. For Court vs. Plaintiff

Costs, \$ 30.50

Fee Book No. Page

Civil Execution Docket Page

I hereby certify that there was a waiver of the right to claim of exemption of personal property as to collection of the debt for which this execution is issued.

Issued, 19

Clerk

Chason, Stone & Chason
Attorneys

Plaintiff's Attorney

Defendant's Attorney

19/36/71

PL 11/1/68

Received in office DEC 15 1987 19

Sheriff

Sheriff's Execution Docket, Page

By virtue of the within Execution I have, at

o'clock M., this

day of , 19, levied

on the following:

01997
RECEIVED

APR 20 1978

THOMAS H. BENTON
SHERIFF

RECEIVED

JAN 19 1987

JAMES B. JOHNSON
SHERIFF



letter to per.

PLAINTIFF'S WITNESSES

10-4-82

~~Returned for a
New Date.~~

~~Thomas H. Benton
Susan O. Haleal~~

DEFENDANT'S WITNESSES

7-22-88

Execution returned
without further action
recalled by the
Circuit Clerk

James B. Johnson
Sheriff

Jerry Polunian
Clerk

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Luzell Ferrell to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of George B. Halliday, individually and doing business as Mattie L. Rhodes Hospital.

Witness my hand this 28 day of June, 1966.

Henry J. Smith
Clerk

GEORGE B. HALLIDAY,
individually and doing
business as MATTIE RHODES
HOSPITAL,

Plaintiff,

vs.

LUZELL FERRELL,

Defendant.

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

7037

COUNT ONE:

The Plaintiff claims of the Defendant One Thousand,
Five Hundred and Forty-seven Dollars and Eighty Cents (\$1,547.80)
due from him by account on the 15th day of November, 1965,

which sum of money with the interest thereon, is still unpaid.

CHASON, STONE & CHASON

By John Earle Chason
Attorneys for Plaintiff

64-6-29-66

FILED
JUN 22 1966
CLERK
JUL 1 1967

no. 7039

Received 28 day of June 1966
and on 29 day of June 1966
I served a copy of the within A & C
on Luzell Ferrell
By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Tolbert D. S.
Cannon

Sheriff claims 30 miles at
Ten Cents per mile Total 3.00
TAYLOR WILKINS, Sheriff
By W. A. Tolbert
DEPUTY SHERIFF

GEORGE B. HALLIDAY,
individually and doing
business as MATTIE RHODES
HOSPITAL,

Plaintiff,

vs.

LUZELL FERRELL,
Slackton, Ala.
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE

FILED
JUN 28 1966
ALICE L. DUCK, CLERK
REGISTER

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA