

Mrs. Dush
Add this in Cost Bill

June 5, 1967

As it is Bill due me by Dept

Hon. Wm. Brevard Hand,
Hand, Arendall, Bedsole, Greaves & Johnston,
P. O. Box 123,
Mobile, Alabama, 36601

IN ACCOUNT WITH

Louise Dusenbury, Court Reporter
Bay Minette, Alabama.

To original and one copy of deposition of
Mr. Ellis W. Bullock, Jr.

One copy of Deposition of Mrs. George C. Meyer,

Both taken in Bay Minette, Alabama, on April 25,
1967, in the office of Chason & Stone, in the case
of Ellis W. Bullock, Jr., vs. Mrs. George C. Meyer,
Circuit Court of Baldwin County, Alabama, case No.

7143-----\$60.00

Plaintiff, X

VS.

MRS. GEORGE C. MEYER, X

Defendant. X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

AMENDED COMPLAINT

Comes now the Plaintiff in the above styled cause by his attorneys, and amends the complaint heretofore filed against him so that the same shall read as follows:

COUNT ONE

The Plaintiff claims of the Defendant Three Thousand, Eighteen Dollars and Three Cents (\$3,018.03) for work and labor done for the Defendant by the Plaintiff during the period of time from November 8, 1963 to and including August 18, 1965, at her request, which sum of money, with the interest thereon, is still unpaid.

Respectfully submitted,

CHASON, STONE & CHASON

By

Attorneys for Plaintiff

The Plaintiff respectfully

demands a trial of this cause by jury.

CHASON, STONE & CHASON

By

A **B** **C** **D**

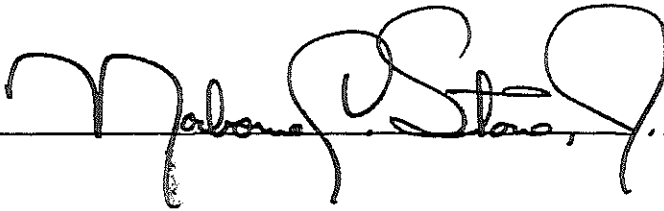
SEP 2 1966

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 08-22-2001 BY 60322 UCBAW

We do hereby acknowledge ourselves
as security for costs.

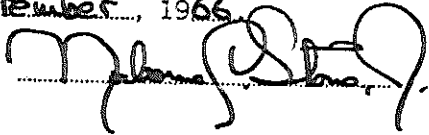
CHASON, STONE & CHASON

By

A handwritten signature in cursive script, appearing to read "Nelson Stone", written over a horizontal line.

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 21 day
of September, 1966.

A handwritten signature in cursive script, appearing to read "Nelson Stone", written over a horizontal line.

7143

ELLIS W. BULLOCK, JR.,

Plaintiff,

vs.

MRS. GEORGE C. MEYER,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

AMENDED COMPLAINT

* * * * *

FILED

SEP 21 1966

Alice J. Duck, Clerk

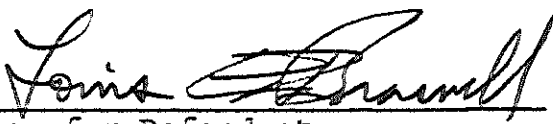
CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

ELLIS W. BULLOCK, JR., : IN THE CIRCUIT COURT OF
 Plaintiff : BALDWIN COUNTY, ALABAMA
 vs. :
 MRS. GEORGE C. MEYER, : AT LAW
 Defendant. : CASE NO. 7143

A N S W E R

Comes now the Defendant in the above-styled cause, and for answer to each separate and several count of the complaint filed herein, as last amended, assigns the following separate and several plea, separately and severally:

1. The material allegations thereof are untrue.


 Attorney for Defendant
 First National Bank Building
 Mobile, Alabama

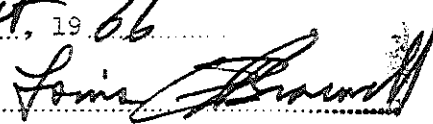
Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES AND JOHNSTON

FILED
 SEP 26 1906
 MOBILE, ALA.

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing pleading to Harborne C. Stone, Jr., Esq., Attorney for Plaintiff by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office in Mobile, Alabama on this, the 27 day of Sept., 1906.



ELLIS W. BULLOCK, JR., : IN THE CIRCUIT COURT OF
 : BALDWIN COUNTY, ALABAMA
Plaintiff, :
vs. : AT LAW
MRS. GEORGE C. MEYER, :
 : CASE NO. 7143
Defendant.

DEMURRER


Comes now the Defendant in the above-styled cause, and sets down and assigns the following separate and several counts of demurrer to each separate and several count of the complaint filed herein, separately and severally:

1. Said count fails to aver that the work and labor done was done at the request of the Defendant.

2. For aught that appears the work which the Plaintiff did was not done at the request of the Defendant.

3. For that said count is not in the form prescribed by Title 7, Section 223 (10) of the Code of Alabama of 1940 as last amended.

4. For that said count is not in the form prescribed by Title 7, Section 223 (10) of the Code of Alabama of 1940 as last amended in that it fails to aver that the work was done at the request of the Defendant.



Attorney for Defendant
First National Bank Building
Mobile, Alabama

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

FILED

SEP 20 1966

ALICE L. DUCK, CLERK
REGISTER

398

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing pleading to Marbourne C. Stone, Jr., Esq., Attorney for Plaintiff by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office in ^{Bay Minette} Mobile, Alabama on this, the 19 day of

Sept, 1966.

Louis E. Braund

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA
36601

MAILING ADDRESS:
P. O. BOX 123

CABLE ADDRESS:
HAB

TELEPHONE:
432-5511
AREA CODE 205

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARD HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. McDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
C. WAYNE LOUDERMILCH

September 20, 1966

Honorable Telfair J. Mashburn
Circuit Judge
Circuit Court of Baldwin County
Bay Minette, Alabama

Re: Bullock vs. Meyer
Case No. 7143
Circuit Court of Baldwin County
Our File: VGJ 1201-K

25-2901

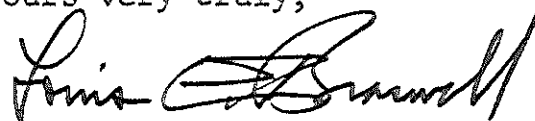
Dear Judge Mashburn:

The purpose of this letter is to inform you that we do not care to present oral argument in support of the demurrer which we have filed to the complaint in the above case. We would, however, like to call your attention to the case of McCrory vs. Brown, 157 Ala. 518, 162 Ala. 442, 50 So. 402. This case is authority for the proposition that a count for work and labor done must aver that the work was done at the request of the defendant. The count in our case, while in some respects in Code form, does not contain the allegation that the work was done at the defendant's request; the Code form at Title 7, Section 223 (10) does contain this allegation.

I would appreciate it very much if you would ask Mrs. Duck to notify me of your ruling on the demurrer.

Thank you very much.

Yours very truly,



For the Firm

LEB.an

cc: Norborne C. Stone, Esquire

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 Mrs. George C. Meyer 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 Ellis W. Bullock, Jr.

Witness my hand this 25th day of August, 1966.

Alice J. Duck
Clerk

ELLIS W. BULLOCK, JR., X

Plaintiff, X

vs. X

MRS. GEORGE C. MEYER, X

Defendant. X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

7143

COUNT ONE

The Plaintiff claims of the Defendant Three Thousand, Eighteen Dollars and Three Cents (\$3,018.03) for work and labor done for the Defendant by the Plaintiff during the period of time from November 8, 1963 to and including August 18, 1965, which sum of money, with the interest thereon, is still unpaid.

Respectfully submitted,

CHASON, STONE & CHASON

By M. J. Stone
Attorneys for Plaintiff

The Plaintiff respectfully

demands a trial of this cause by jury.

CHASON, STONE & CHASON

By M. J. Stone

396 JG 25 1966

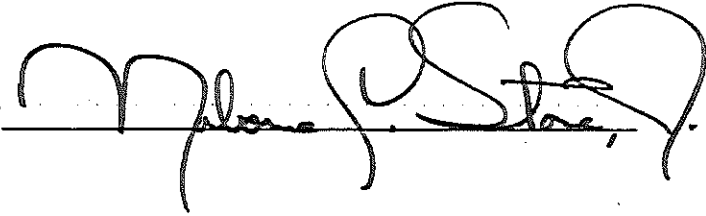
FILED
AUG 1 1966
CLERK

Executed 9-13-66
Dayton Robbins
by J. M. Eastburn
185

We do hereby acknowledge ourselves
as security for costs.

CHASON, STONE & CHASON

By

A handwritten signature in dark ink, appearing to read "Henry J. Stone", is written over a horizontal line.

FILED

AUG 27 1966

ALICE A. DICK, CLERK
FEDERAL BUREAU OF INVESTIGATION

E

Received 25 day of Aug. 1966
and o 13 day of Sept. 1966
I served a copy of the within Q & C
on Mrs. George C. Meyer
By service on Mrs. George C. Meyer

TAYLOR WILKINS, Sheriff
J. M. Eastburn D.S.
Gulf Shores, Ala.

Sheriff claims 100 miles at
Ten Cents per mile Total \$ 10.00
TAYLOR WILKINS, Sheriff
BY J. M. Eastburn
DEPUTY SHERIFF

7143

ELLIS W. BULLOCK, JR.,
Plaintiff,

VS.

MRS. GEORGE C. MEYER,
Defendant.

Gulf Shores
* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *

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