

GALLION, HARE AND ANDERSON  
ATTORNEYS AT LAW  
TYSON BUILDING  
MONTGOMERY, ALABAMA 36104  
PHONE 262-6694

MACDONALD GALLION  
NICHOLAS S. HARE  
W. MARK ANDERSON, III

October 13, 1966

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

Re: J. B. Williams and Company, Inc.  
v.  
Eduardo Johnson

---

Dear Mrs. Duck:

Please file the enclosed Complaint for us. The defendant can be found at 125 Confederate Drive, Spanish Fort, Alabama.

Thank you for your attention.

Yours very truly,



W. Mark Anderson, III

Gallion, Hare and Anderson  
Attorneys for Plaintiff

WMA/mje

Enc.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 7214

PLEA

Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause and to each count thereof says; separately and severally:

1. The allegations of count one of the complaint are untrue.

2. The allegations of count two of the complaint are untrue.

Attorney for Defendant

Defendant demands a trial by jury  
of said cause.

Attorney for Defendant

FILED  
NOV 16 1966  
ALICE L. DUCK, CLERK  
REGISTER

J. B. WILLIAMS and COMPANY,  
INC., a corporation,

Plaintiff

VS

EDUARDO JOHNSON

Defendant

) IN THE CIRCUIT COURT OF  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

BALDWIN COUNTY, ALABAMA

AT LAW NO. 7214

Comes C. LENOIR THOMPSON, attorney and files this, his  
appearance in the above styled case as attorney for the  
plaintiff herein and replacing the attorney previously of  
record for said plaintiff.

  
Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he has on this  
date sent by U. S. Mail a copy of the foregoing to Mr. Eduardo  
Johnson, 125 Confederate Drive, Spanish Fort, Alabama, Defendant  
in the above styled cause.



FILED

AUG 7 1961

CLERK OF COURT

7214

8

J. B. WILLIAMS AND COMPANY,  
INC, a corporation

PLAINTIFF

VS

EDUARDO JOHNSON

DEFENDANT

FILED

AUG 7

WILLIAM L. DUFF, CLERK  
RECEIVED

THE STATE OF ALABAMA }  
BALDWIN }  
Montgomery County }

To any Sheriff of the State of Alabama—GREETING:

You are Hereby Commanded to Summon

Eduardo Johnson  
125 Confederate Drive  
Spanish Fort, Alabama

Baldwin  
to appear for the Circuit Court of ~~Montgomery~~, in and for said County, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur or plead to the complaint of

J. B. Williams and Company, Inc.

And you are hereby commanded to execute this process instantler and make return as required by law.

Witness my hand this 14 day of

Oct

1966

*W. Mark Anderson III*  
Clerk.

COMPLAINT

THE STATE OF ALABAMA  
Bay Minette  
Montgomery, Alabama

J. B. Williams and  
Company, Inc., a  
Corporation,

Plaintiff

VS.

Eduardo Johnson Term, 19

72-7414

Defendant

~~The plaintiff claims of the Defendant~~

COUNT I

The Plaintiff claims of the Defendant \$1,100.00, due by promissory note made by him on the 20th day of February, 1965, and payable on the 21st day of May, 1965, with interest thereon at the rate of 7%, commencing on, to wit, February 20, 1965.

COUNT II

The Plaintiff claims of the Defendant the additional sum of \$190.42, due from him for money paid by the Plaintiff for the Defendant on or before, to wit, the 23rd day of December, 1965, at his request, which sum of money, with interest thereon, is still unpaid, and is the property of the Plaintiff.

*W. Mark Anderson III*  
W. MARK ANDERSON, III  
Gallion, Hare and Anderson  
Tyson Building  
Montgomery, Alabama  
Attorneys for Plaintiff

FILED

OCT 14 1966

67-10-21-66

408

THE STATE OF ALABAMA  
BALDWIN  
MONTGOMERY County

To the Sheriff of Said County—GREETINGS:

The Plaintiff having given bond and made affidavit as required by law, you are hereby required to take the property mentioned in the complaint into your possession, unless the defendant give bond, payable to the Plaintiff, with security in double value of the property, conditioned that if the Defendant is cast in the suit he will, within thirty days thereafter, deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

WITNESS my hand this

day of

A. D., 19

Clerk, Circuit Court, ~~Montgomery~~ Baldwin County.

(Thursday evening)

No. 72 14

J. B. Williams & Company,  
Inc.

vs.

Eduardo Johnson  
*125 Randolph St.  
Spanish Fort*

CIRCUIT COURT  
OF BALDWIN  
MONTGOMERY COUNTY

Term, 19

## SUMMONS AND COMPLAINT

Filed in office this 14 day of

Oct A. D. 1966

*Dee J. Duck*  
Clerk.

Plaintiff's Attorney

*William H. Anderson*

WALKER PRINTING CO.

*Spanish Fort, Bal. Montgomery Co.*

Received in office

RECEIVED

day of

19

OCT 14 1966

TAYLOR WILKINS  
SHERIFF

Sheriff

Executed by serving cop

of the within. Summons and Complaint on

Defendant this the Oct 21 day of

1966

Sheriff

*Eduardo Johnson*

*Taylor Wilkins*

*Roy Randall D.S.*

*Spanish Fort*

44

4.40

*Roy Randall*