

P. O. DRAWER A-J

RICHARD C. LACEY

TELEPHONE 928-2373

*Attorney at Law*

FAIRHOPE, ALABAMA 36532

February 1, 1967

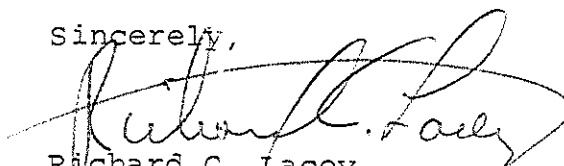
Mrs. Alice Duck  
Circuit Clerk  
Bay Minette Courthouse  
Bay Minette, Alabama

Re: Edward B. Baumhauer Vs.  
Paul D. Strickland, Jr.

Dear Mrs. Duck:

Enclosed please find plead in subject case.

Sincerely,



Richard C. Lacey

RCL:mw

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 Paul D. Strickland, Jr. 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 Edward B. Baumhauer.

Witness my hand this 5 day of January, 1967.

*Alice J. Smith*  
Clerk

EDWARD B. BAUMHAUER,	X	
	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
PAUL D. STRICKLAND, JR.,	X	
	X	LAW SIDE
Defendant.	X	

*W. 7330*

COUNT ONE:

The Plaintiff claims of the Defendant Three Thousand Five Hundred Dollars (\$3,500.00) due from him on account stated between the Plaintiff and the Defendant on the 15th day of April, 1963, which sum of money, with the interest thereon is still unpaid.

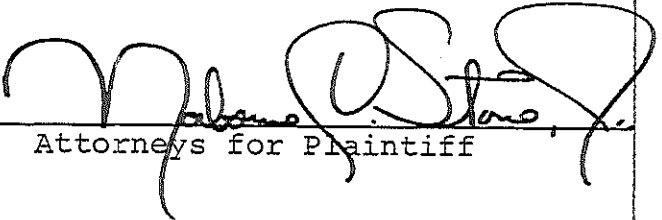
COUNT TWO:

The Plaintiff claims of the Defendant Three Thousand

Five Hundred Dollars (\$3,500.00) due from him for work and labor done for the Defendant by the Plaintiff on the 6th day of September, 1963 and for several months prior thereto, at his request, which sum of money, with the interest thereon is still unpaid.

CHASON, STONE & CHASON

By:

  
Attorneys for Plaintiff

The Defendant resides at  
Fairhope, Alabama.

FILED

JAN 5 1967

ALICE L. DUCK, CLERK  
REGISTER

5 day of Jan. 1967  
10 day of Jan. 1967  
a copy of the within  
Paul D. Strickland Jr.

By service on Paul D. Strickland Jr.  
Taylor Wilkins, Sheriff  
By Ray Ravelal D.S.

Sheriff claims 20 miles at  
Ten Cents per mile Total \$ 2.00  
Taylor Wilkins Sheriff  
By Ray Ravelal  
DEPUTY SHERIFF

70.7330

EDWARD B. BAUMHAUER,  
Plaintiff,

VS.

PAUL D. STRICKLAND, JR.,  
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

SUMMONS AND COMPLAINT

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

EDWARD B. BAUMHAUER,                    )    IN THE CIRCUIT COURT OF  
  )    BALDWIN COUNTY, ALABAMA  
VS.   )  
PAUL D. STRICKLAND, JR.,               )    LAW SIDE  
  )    NO. 7330  
Defendant.                                )

Comes now the Defendant in above styled cause and pleads specially to each count thereof and as grounds for said pleads saith:

COUNT ONE:

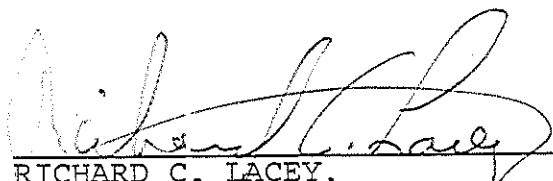
Not guilty.

COUNT TWO:

Defendant pleads Statute of Limitations of three (3) years.

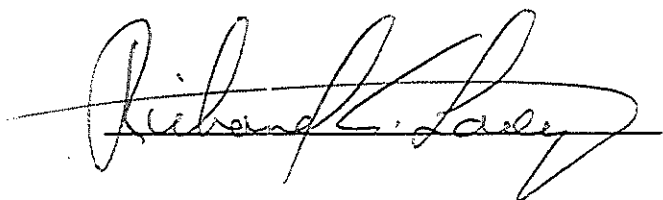
COUNT THREE:

Defendant pleads that said action is barred by the Statute of Limitations of three (3) years for that said action was commenced more than three (3) years from the 15th day of April, 1963.

  
RICHARD C. LACEY,  
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 1st day of February, 1967, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.



FILED  
FEB 3 1967  
ALICE J. DICK, CLERK  
RECEIVED

EDWARD B. BAUMHAUER,

Plaintiff,

vs.

PAUL D. STRICKLAND, JR.,

Defendant

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7330

DEMURRER TO PLEAS

Comes now the Plaintiff in the above styled cause, by his attorneys, and demurs to the Pleas "TWO" and "THREE" and assigns the following separate and several grounds in support thereof:

(1) Said Pleas are immaterial.

(2) Said Pleas do not constitute a defense to the cause of action sued on.

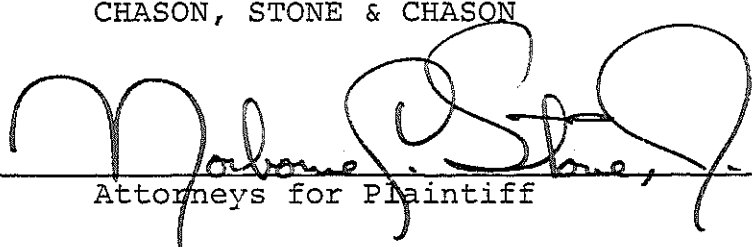
(3) Said Pleas are inappropriate.

(4) Said Pleas constitute no defense to a cause of action for account stated.

Respectfully submitted,

CHASON, STONE & CHASON

By:

  
Attorneys for Plaintiff

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 4<sup>th</sup> day of October, 1967.



**FILED**

OCT 4 - 1967

**ALICE J. DUCK**

CLERK  
REGISTER