RAY K. PARKER, : IN THE CIRCUIT COURT OF

Plaintiff, : BALDWIN COUNTY, ALABAMA

VS. :

THOMAS S. PETTIGREW and VIOLA H. PETTIGREW,

Defendants.

CASE NO. 7391

COUNT ONE

The Plaintiff claims of the Defendants separately and severally the sum of ONE THOUSAND AND 42/100 (\$1,000.42) DOLLARS due from them for work and labor done for the Defendants by the Plaintiff between, to-wit, December 31, 1964 and, to-wit, January 31, 1966, which sum of money, with the interest thereon, is still unpaid.

GAILLARD, WILKINS & SMITH Attorneys for Plaintiff

By Hardy B. Smith

The Defendants may be served at:

Route 1, Box 494-A Daphne, Alabama 36526 (Lot 1, First Addition, Spanish Fort Estates)



STATE OF ALABAMA Baldwin County Circuit Court, Baldwin County No. 7391	i
TERM,	19
TO ANY SHERIFF OF THE STATE OF ALABAMA:	i in in
You Are Hereby Commanded to Summon	
Thomas 5 Petterson and	
Viola H. Pettskereer	
to appear and plead, answer or demur, within thirty days from the service hereof, to the comple	aint filed
in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against	
Thomas S. Pettigrew Viola H. Pettigreul, Defer	ıdant
by Ray K. Parher	
Pla	aintiff
Witness my hand this 23 day of 716-19467	
litical above to	,

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No. 739/ Page	
STATE OF ALABAMA Baldwin County	Defendant lives at
CIRCUIT COURT	Received In Office
Ray K. Far her.	JAYLUK WILKINS SHERIFF
Plaintiffs	I have executed this summons
vs.	this 414,24) 120
Thomas S. Pettigrous	by leaving a copy with
Varla X: Pettigreus	Thymas S. Pettigran
SUMMONS AND COMPLAINT	
	Viola H. Pettipreur
Filed	(Spanish Soft)
Lean LARCH Clerk	
	Sheriff claims QQ
	Ten Cenis par mile 19218
	BY COR WILLIAMS, SINCESS
Mailland wilking Smul	A Randa Ol
Plaintiff's Attorney	Sayn William Sheriff
Defendant's Attorney	Rog Randell Deputy Sheriff

RAY K. PARKER,

Plaintiff,

VS.

THOMAS S. PETTIGREW and VIOLA H. PETTIGREW,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 7391

PLEAS

Now come the defendants in the above styled cause and for plea to the complaint heretofore filed in said cause say, separately and severally:

- 1. The allegations of the complaint are untrue.
- 2. The defendants for answer to the complaint say that they have paid the debt for the recovery of which this suit was brought, before the action was commenced.
- 3. The defendants, as a defense to the action of the plaintiff, say that, at the time said action was commenced, the plaintiff was indebted to them in the amount of Five Thousand Dollars (\$5,000.00) for money on the 31st day of January, 1966, received by the plaintiff to the use of the defendants, which sum of money, with the interest thereon, is still unpaid and which sum the defendants hereby offer to set off against the demand of the plaintiff and they claim judgment for the excess.

Attorney for Defendants

Collections & CF SERVICE

I coulty that a copy of the foresting pleading bas book served upon a real for all parties of this particular, in the collection of the policy o



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LAW OFFICES OF

GAILLARD, WILKINS & SMITH

HANNAH HOUSES

157-159 N. CONCEPTION STREET

P. O. BOX 164

MOBILE, ALABAMA

432-1832

S. PALMER GAILLARD, JR. ROBERT B. WILKINS HARDY B. SMITH EMMETT R. COX

S. PALMER GATLLARD (1881-1959)

WILLIAM O.KIRK,JR.

February 22, 1967

Mrs. Alice Duck Circuit Clerk Baldwin County Court House Bay Minette, Alabama 36507

Re: Ray K. Parker vs. Thomas
S. Pettigrew and Viola H.
Pettigrew

Dear Mrs. Duck:

I enclose the original and two (2) copies of a complaint in the above styled case. Would you please file the original and have the Sheriff serve Mr. and Mrs. Pettigrew at the address shown on the complaint.

Very truly yours,

GAILLARD, WILKINS & SMITH

Hardy B. Smith

HBS/dh Encls