

7489

GEORGE T. DRIVER  
ATTORNEY AT LAW  
601 FIRST NATIONAL BANK BUILDING  
TELEPHONE PLAZA 2-6866  
TUSCALOOSA, ALABAMA

April 22, 1967

Courthouse  
Circuit Clerk  
Baldwin County, Alabama


Dear Sir:

We are enclosing with two copies of a summons and complaint in case of Gulf Coast Molasses Company vs. Otis Irwin.

Please file the above case and after Mr. Otis has been served advise us of the date set for trial.

Your cooperation in this matter will be appreciated.

Sincerely yours,

  
George T. Driver  
Attorney

GTD:ms

Enclosures

THE STATE OF ALABAMA  
 XXX XXXXXXXXXXXXXXXXXXXX  
 X TUSCALOOSA COUNTY

Baldwin County

**To any Sheriff of the State of Alabama—Greeting:**

You are hereby commanded to summon Mr. Otis Irwin, Robertsdale, Alabama

to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur within thirty days from service hereof to the complaint of Gulf Coast Molasses Company, a corporation.

Witness, my hand this 24 day of

Clerk.

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT.

## COMPLAINT

Gulf Coast Molasses Company,  
a corporation, Fairhope, Alabama

Plaintiff

**VS.**

Mr. Otis Irwin, Robertsdale,  
Alabama

Defendant

Baldwin  
XXXXXX  
IN THE CIRCUIT COURT OF TUSCALOOSA  
COUNTY, ALABAMA  
AT LAW:

Case No. 7489

**COUNT ONE**

~~XXXXThePlaintiffXclaimsXthatXtheXDefendantX~~

COUNT 1. The Plaintiff claims of the defendant the amount of \$175.18 due from him by account on the 18th day of January, 1966. Demand has been made by the Plaintiff of the defendant for the above said sum remains due and unpaid and said sum is justly owed by the defendant to the Plaintiff, with interest thereon.

COUNT 2.

Defendant may be served at Route 1, Box 42, Robertsedale, Alabama.

George T. Driver  
Attorney for Gulf Coast Molasses Co.  
P. O. Box 423  
Aliceville, Alabama

Plaintiff's Attorney

FILE

APR 24 1967

ALICE L. GUY, CLERK  
REGISTER

No. 7489

THE STATE OF ALABAMA  
TUSCALOOSA COUNTY  
BALDWIN

CIRCUIT COURT

GULF COAST MOLASSES COMPANY

A CORP.,

Plaintiff

vs.

MR. OTIS IRWIN, Robertsdale, Ala.

Defendant

Summons and General Complaint

Filed this \_\_\_\_\_ day of \_\_\_\_\_

1967

Clerk

George T. Driver - P. O. Box 423  
Aliceville, Ala. Plaintiff's Attorney

FILED  
APR 24 1967

Alice L. Buck, CLERK  
REGISTER

RECEIVED

Received this APR 24 1967 day of

TAYLOR WILKINS 196  
SHERIFF

Sheriff

Executed this 28 day of

1967

by leaving a copy of the within Summons

and Complaint with

George T. Driver  
Defendant

By Sheriff  
R. W. Adams  
Sheriff

Sheriff claims 50 miles

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY Carlisle Childers  
DEPUTY SHERIFF