

JACK CROLEY, d/b/a DEEP
SOUTH SALES COMPANY,

Plaintiff,

VS:

JOHN HOEHN,

Defendant

: IN THE CIRCUIT COURT OF
:
: BALDWIN COUNTY, ALABAMA

:
:
: AT LAW

:
:
: NO. 7503

Comes now JOHN HOEHN, Defendant in the above captioned cause,
and for answer to the bill of complaint heretofore filed by the Plaintiff to say as
follows, separately and severally:

1. Not guilty.
2. The material allegations of the complaint are untrue.
3. The Defendant is not indebted to the Plaintiff, JACK CROLEY,

d/b/a DEEP SOUTH SALES COMPANY.

McDERMOTT, SLEPIAN & FEIBELMAN
Attorneys for Defendant

By: 

RONALD P. SLEPIAN

Defendant respectfully demands a trial by jury.

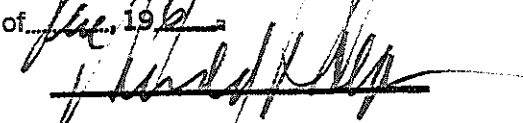
McDERMOTT, SLEPIAN & FEIBELMAN
Attorneys for Defendant

By: 

RONALD P. SLEPIAN

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 8 day
of June, 1967



FILED

JUN 8 1967

FILED IN CASE NO. 7503
REGISTERED

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John Hoehn 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 the same, then and there to answer the complaint of Jack Croley, d/b/a Deep South Sales Company.

WITNESS my hand this 5th day of May, 1967.

Alice J. Duck

JACK CROLEY, d/b/a
DEEP SOUTH SALES COMPANY

Plaintiff

vs

JOHN HOEHN

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 9503

-1-

The plaintiff claims of the defendant Two Thousand (\$2,000.00) Dollars due from him by account on the 1st day of October, 1965, which sum of money, with the interest thereon, is still unpaid.

C. L. Davis
Attorney for plaintiff

FILED

MAY 5 1967

Alice J. Duck, CLERK
REGISTERED

JACK CROLEY, d/b/a
DEEP SOUTH SALES COMPANY

Plaintiff

vs

JOHN HOEHN

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

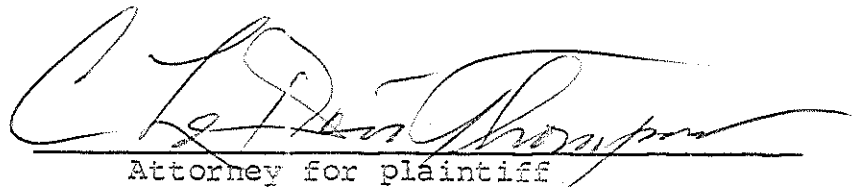
BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

Comes the plaintiff in the above styled cause and propounds
the following interrogatories to the defendant John Hoehn:

1. State your name.
2. Are you the same John Hoehn who operated a business in
Atmore, Alabama?
3. If so, state the name of the business you operated.
4. In the course of your business operations in Atmore,
did you make any purchases from Deep South Sales Company?
5. If your answer to the foregoing question is "yes"
state whether or not you have any records of those purchases and
whether or not you have received any bills from Deep South Sales
Company since you ceased to operate said business.
6. If your answer is "yes", have you paid the bills received
from Deep South Sales Company since you ceased to operate your
business in Atmore?
7. If your answer is "yes", attach the cancelled checks
showing said payments.


Attorney for plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said
~~State and County~~, personally appeared C. LeNoir Thompson, who
being by me first duly sworn, deposes on oath and says as
follows:

My name is C. LeNoir Thompson and I am one of the Attorneys
of Record for the plaintiff in the above entitled cause, and as
such, I am authorized to make this affidavit. I further state
that the answer of the defendant to the foregoing interrogatories

will, if truthfully made, be material evidence for the plaintiff
on the trial of said cause.

C. LeNoir Thompson
C. LeNoir Thompson

Subscribed and sworn to before me by the said C. LeNoir
Thompson on this the 5 day of May, 1967.

Helen M. Powell
Notary Public, Baldwin County, Alabama

FILED

MAY 5 1967

ALICE L. BUCK, CLERK
REGISTER

727

Executed
5-18-67

7503

Jack Croley d/b/a
Deep South Sales
Company.

Pltf.

vs.

John Hoehn
Def.

Summon & Complaint
Interrogatories

FILED

MAY 5 1967

ALICE L. DUCK, CLERK
REGISTER

Summons
Trailer Court
Daphne.

Received 5 day of May 1967
and on 18 day of May 1967
I served a copy of the within Summons
on John Hoehn

My service on above
Daphne
TAYLOR WILKINS, Sheriff
By Roy Randall D. S.

Sheriff claims 54 miles at
Ten Cents per mile Total \$ 5.40
TAYLOR WILKINS, Sheriff
BY Roy Randall
DEPUTY SHERIFF