

JOHN V. DUCK
~~DUCK & LACEY~~
Attorneys at Law

P. O. DRAWER A-J - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE

DATE June 23, 1967

Re: J. D. Reed, ind. & dba McNeese Roofing
Company vs. Richard W. Hager and
Clarita K. Hager.

700-7585

Dear Mrs. Duck:

Enclosed please find Bill of Complaint to
be filed together with copy of same and

Summons to be served. Defendants are presently
in Forest Home, Ala.

Sincerely,

26 1967

SIGNED

SIGNED

J. D. REED, individually and
doing business as McNeese
Roofing Company,

Plaintiff,

VS.

RICHARD W. HAGER and CLARITA
K. HAGER, jointly and individually,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7585

PLEA

Now come the defendants in the above styled cause and for
plea to the complaint and each count thereof, separately and
severally, says, separately and severally:

1. The allegations of the complaint are untrue.


Attorney for Defendants

FILED

JUL 24 1967

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

☐ Baldwin County

Circuit Court, Baldwin County

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon RICHARD W. HAGER and CLARITA K. HAGER,

JOINTLY AND INDIVIDUALLY,

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint

filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

RICHARD W. HAGER and CLARITA K. HAGER, jointly and/..... individually, Defendant.....

by J. D. REED, dba McNEESE ROOFING COMPANY

....., Plaintiff.....

Witness my hand this 26 day of June 1967.

E/ 6-11-67

305

Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

J. D. REED, individually and

doing business as McNEESE

ROOFING COMPANY

Plaintiffs

vs.

RICHARD W. HAGER and CLARITA

K. HAGER, jointly & ^{Defendants} Individually,

Individually,

SUMMONS AND COMPLAINT

Filed 6-26 1967

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
FOREST HOME, ALABAMA (near
Greenville, Ala.) or beach house
in parent Clear, Ala.

Received In Office

Sheriff

I have executed this summons

this July 11 1960

by leaving a copy with

Richard W. Hager
J. Claviter K. Hager

Sheriff

Deputy Sheriff

J. D. REED, individually and
doing business as McNEESE
ROOFING COMPANY,

Plaintiff,

vs.

RICHARD W. HAGER and CLARITA
K. HAGER, jointly and individ-
ually,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

7585

COUNT ONE

Plaintiff claims of the Defendants the sum of ONE THOU-
SAND ONE HUNDRED (\$1,100.00) DOLLARS due from them by account on,
to-wit: the 22nd day of June, 1967, which sum of money with the
interest thereon, is still unpaid.

COUNT TWO

Plaintiff claims of the Defendants the sum of ONE THOU-
SAND ONE HUNDRED (\$1,100.00) DOLLARS due from them by accounts
dated on, to-wit: the 22nd day of June, 1967, which sum of money
with the interest thereon, is still unpaid.


ATTORNEY FOR PLAINTIFF

FILED

JUN 26 1967

ANGEL DUCK

CLERK
REGISTER