

PACE-HOLLAND COMPANY, a
Corporation,

Plaintiff,

vs.

H. E. ANDRESS,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7656

Comes now the Defendant in the above styled cause
and for answer to the Complainant's Bill of Complaint and
to each count thereof, says:

1.

That he is not guilty of the matters alleged therein.

2.

That he has paid the debt for the recovery for which
this suit was brought before the action was commenced.

3.

That said debt is barred by the statute of limitations
of three years.

4.

That said debt is barred by the statute of limitations
of six years.

WILTERS, BRANTLEY & NESBIT

BY:

Harry J. Wilters Jr.
Attorneys for the Defendant

Defendant demands a trial
by jury.

WILTERS, BRANTLEY & NESBIT

BY:

Harry J. Wilters Jr.

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 31 day of August
1967 served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United State
Mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

Harry J. Wilters Jr.

FILED

AUG 31 1967

ALICE J. PUCK

CLERK
REGISTER

STATE OF ALABAMA)

BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon H. E. ANDRESS, 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 PACE-HOLLAND COMPANY, a corporation.

Witness my hand, this the 2nd day of August, 1967.

Alice J. Duck
Clerk

PACE-HOLLAND COMPANY, a
corporation,
Plaintiff,

vs

H. E. ANDRESS,
Defendant.

) IN THE CIRCUIT COURT OF
)
)
) BALDWIN COUNTY, ALABAMA
)
)
) AT LAW
)

No. 7656

COUNT ONE

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY NINE & 20/100 (\$159.20) DOLLARS, due from him by account on the 13th day of December, 1966, which sum of money with interest thereon is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY NINE & 20/100 (\$159.20) DOLLARS, on account stated between the Plaintiff and Defendant on the 13th day of December, 1966, which sum of money with interest thereon is still unpaid.

John P. Beebe
Attorney for Plaintiff

FILED

AUG 2 1967

ALICE J. DUCK CLERK
REGISTER

7656

Received 2 day of Aug. 1967
at on 9 day of August 1967
served a copy of the within 87 C
H. E. Address

service on Alice

TAYLOR WILKINS, Sheriff

By Jm Estlin
Foley, Ala

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY Jm Estlin
DEPUTY SHERIFF

PACE-HOLLAND COMPANY, A Corp.,

Plaintiff,

vs:

H. E. ADDRESS,

Foley

Defendant

SUMMONS & COMPLAINT

FILED

AUG 2 1967

ALICE J. BEEBE

CLERK
REGISTER

JOHN P. BEEBE