

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck
Bay Minette, Ala.

DATE

DATE September 26, 1967

Re: Verjester Williams vs. Ed Tucker

Dear Mrs. Duck:

700.7764

Enclosed please find Bill of Complaint to
be filed, together with copy of same and
Summons to be served.

Sincerely,

John V. Duck
(64)

SIGNED

SIGNED

JOHN V. DUCK
ATTORNEY AT LAW
P. O. BOX Y
FAIRHOPE, ALABAMA 36532

January 22, 1969

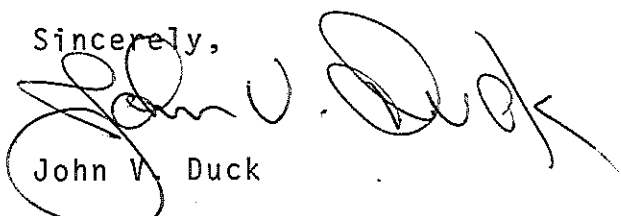
Mrs. Alice J. Duck
Clerk of Circuit Court
P. O. Box 239
Bay Minette, Alabama

Re: Verjester Williams vs.
Ed Tucker
Civil Case No. 7764

Dear Mrs. Duck:

Would you please ask the Judge to enter a non-suit
in the above styled cause.

Sincerely,



John V. Duck

JVD:lh

cc: Honorable John Courtney
1st National Bank Bldg.
Mobile, Ala.

VERJESTER WILLIAMS,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs.) AT LAW
ED TUCKER,) CASE NO. 7764
Defendant.)

COUNT ONE

Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY-TWO AND 50/100 (\$332.50) DOLLARS for money loaned by the Plaintiff to the Defendant, which sum of money with the interest thereon, is still unpaid.

COUNT TWO

Plaintiff claims of the Defendant the sum of ONE HUNDRED EIGHTY-NINE (\$189.00) DOLLARS for work and labor done by the Plaintiff at the Defendant's request from on, to-wit: the 1st day of March, 1967 until on, to-wit: the 15th day of April, 1967, which sum of money, with the interest thereon, is still unpaid.

COUNT THREE

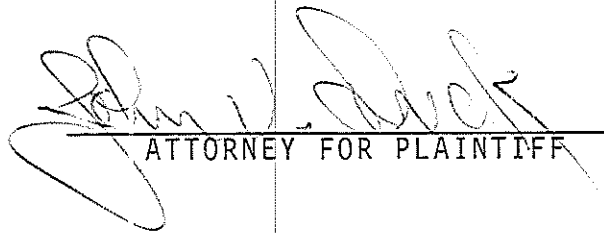
Plaintiff claims of the Defendant the sum of ONE HUNDRED (\$100.00) DOLLARS for money on, to-wit: the 1st day of March, 1967, received by the Defendant to the use of the Plaintiff, which sum of money, with the interest thereon, is still unpaid.

FILED

SEP 28 1967

ALICE J. DUCK

CLERK
REGISTER


ATTORNEY FOR PLAINTIFF

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 SummonED TUCKER

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.....

ED TUCKER

....., Defendant.....

byVERJESTER WILLIAMS

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

Witness my hand this.....24.....day of.....Sept.....1967

.....Clerk

730

24-10-2-67

No. 9764

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

VERJESTER WILLIAMS

Plaintiffs

vs.

ED TUCKER

Defendants

SUMMONS AND COMPLAINT

Filed FILED 19.....

SEP 28 1967 Clerk

ALICE J. DUCK

CLERK
REGISTER

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Blue Flame Club at Edgewater
Beach, Daphne, Alabama

RECEIVED

Received In Office

SEP 28 1967 19.....

TAYLOR WILKINS Sheriff
SHERIFF

I have executed this summons

this 10 - 2 - 1967

by leaving a copy with

Ed. Tucker
Daphne

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

BY Roy Randall
Deputy Sheriff

Taylor Wilkins Sheriff
Roy Randall Deputy Sheriff

VERJESTER WILLIAMS

Plaintiff

VS.

ED TUCKER

Defendant

: IN THE CIRCUIT COURT OF

: BALDWIN COUNTY, ALABAMA

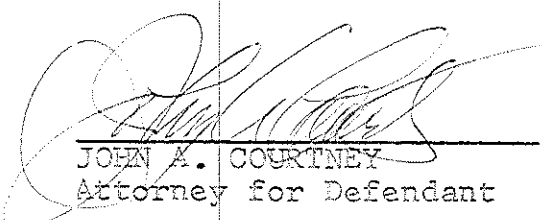
: AT LAW

:

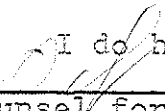
: CASE NO. 7764

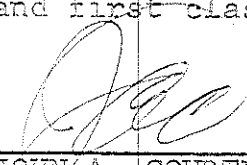
Comes now the Defendant in the above styled cause and for answer to the Plaintiff's complaint and to each count thereof, separately and severally, files the following separately and severally to-wit:

1. Not guilty.
2. Not indebted.
3. The Defendant is not indebted to the Plaintiff in the amount claimed.
4. The Defendant is not indebted to the Plaintiff in any amount.
5. Any amounts paid to the Defendant by the Plaintiff was in pursuance of a partnership arrangement verbal in nature and are not recoverable from this Defendant by this Plaintiff.
6. Any monies paid to the Defendant by the Plaintiff were pursuant to a partnership agreement which the Plaintiff abandoned and which said monies are not recoverable from the Defendant by this Plaintiff.


JOHN A. COURTNEY
Attorney for Defendant

CERTIFICATE OF SERVICE.

 I do hereby certify that I have on this the 5 day of October, 1967, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first-class postage prepaid.


JOHN A. COURTNEY
Attorney for Defendant


10-6-67
G. A. Black
clerk