

MEMO-LETTER

JOHN V. DUCK

Attorney at Law

P. O. DRAWER Y - FAIRHOPE, ALABAMA

MESSAGE

REPLY

TO

Mrs. Alice J. Duck

Bay Minette, Ala.

DATE

DATE

July 3, 1968

Re: Parker vs. Adams. Civil No. 8163

Dear Mrs. Duck:

Enclosed please find Demurrer to be filed
in captioned Case.

Sincerely,

John V. Duck
(JH)

SIGNED

SIGNED

STATE OF ALABAMA,
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,
NO.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon RICHARD ADAMS and RONALD J. ADAMS, 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 ADAMS and RONALD J. ADAMS, Defendants, by MRS. JOHN M. PARKER, Plaintiff.

WITNESS my hand this 5 day of June 1968.

Elise J. Duck Clerk.

MRS. JOHN M. PARKER,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
VS.	X	BALDWIN COUNTY, ALABAMA,
RICHARD ADAMS and RONALD J. ADAMS,	X	AT LAW.
Defendants.	X	8163

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendants TWO HUNDRED EIGHT AND 58/100 (\$208.58) DOLLARS due from them by account, on, to-wit, the 1st day of March, 1968, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

Count II.

The Plaintiff claims of the Defendants the sum of TWO HUNDRED EIGHT AND 58/100 (\$208.58) DOLLARS due from them as a balance on rent from premises in Fairhope, Baldwin County, Alabama, leased by the Plaintiff to the Defendants from the 1st day of October, 1967, to the last day of February, 1968.

E. G. Rickarby
E. G. RICKARBY,
Attorney for Plaintiff.

Richard Adams can be located c/o Insulation Eng^s, P. O. Box 1883, Mobile, Alabama; Ronald J. Adams can be located c/o Laidlaw Contracting Co., 2557 Durham Drive, Mobile, Alabama.

VERIFICATION FOR ITEMIZED STATEMENT OF ACCOUNT

STATE OF ALABAMA,
COUNTY OF BALDWIN.

Before me, the undersigned Notary Public, in and for said County, in said State, personally appeared MRS. JOHN M. PARKER, an individual, who being duly sworn, deposes and says that she has knowledge of the account owed to her by RICHARD ADAMS and RONALD J. ADAMS for the balance due on rent.

That the attached itemized statement is a true and correct statement of the account owed by RICHARD ADAMS and RONALD J. ADAMS to MRS. JOHN M. PARKER.

That there is now owing by the said RICHARD ADAMS and RONALD J. ADAMS the sum of TWO HUNDRED EIGHT AND 58/100 (\$208.58) DOLLARS, with interest from the 31 Day of May, 1968, after allowing all credits.

Mrs. John M. Parker
Affiant

Subscribed and Sworn to before me
this the 31 day of May,
1968.

[Signature]
Notary Public, Baldwin County,
Alabama.

JUN 5 1968

CLERK
REGISTER

RETURNED TO
RAY D. BRIDGES, Sheriff
Not found in my County
gent see in and inquiry.
By *J. J. Komar*

Received *6* Day of *June* 1968
at *7* *Day*
I served *Richard Adams*
on *Richard Adams*
by service on
RAY D. BRIDGES, Sheriff
Ray D. Bridges

RECEIVED
JUN 5 1968
RAY D. BRIDGES
SHERIFF

sent 8/63 4833
Mr. John M. Parker
Petz.
us. 7th Dist
Richard Adams &
Ronald J. Adams
100 ft.

E. G. Rickaby

RECEIVED
JUN 6 12:50 PM '68
ALBANY COUNTY, ALA.

FILED
JUN 5 1968

STATE OF ALABAMA,
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,
NO.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon RICHARD ADAMS and RONALD J. ADAMS, 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 ADAMS and RONALD J. ADAMS, Defendants, by MRS. JOHN M. PARKER, Plaintiff.

WITNESS my hand this 5th day of June, 1968.

Alice J. Duck Clerk.

MRS. JOHN M. PARKER,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

VS.

X

BALDWIN COUNTY, ALABAMA,

RICHARD ADAMS and RONALD J. ADAMS, X

AT LAW.

Defendants.

X

8163

C O M P L A I N T

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E. G. RICKARBY,
Attorney for Plaintiff.

Richard Adams can be located c/o Insulation Eng^g, P. O. Box 1883, Mobile, Alabama; Ronald J. Adams can be located c/o Laidlaw Contracting Co., 2557 Durham Drive, Mobile, Alabama.

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That the attached itemized statement is a true and correct statement of the account owed by RICHARD ADAMS and RONALD J. ADAMS to MRS. JOHN M. PARKER.

That there is now owing by the said RICHARD ADAMS and RONALD J. ADAMS the sum of TWO HUNDRED EIGHT AND 58/100 (\$208.58) DOLLARS, with interest from the _____ Day of _____, 19____, after allowing all credits.

Mrs. John M. Parker
Affiant

Subscribed and Sworn to before me
this the _____ day of _____,
1968.

Notary Public, Baldwin County,
Alabama.

FILED

JUL 5 1968

ALLIANCE
CLERK
REGISTER

Ronald and Richard Adams
Amount Owed to
Mrs. John M. Parker.

Rent:
October, November, December 1967
January, February 1968

	\$ 427.50
	11.99
Telephone	49.13
Payment on TV	37.46
Repair on TV	20.00
Clean Apartment & Yard	<u>\$ 546.08</u>

Paid	277.50
Bal. Due -	<u>\$ 268.58</u>
2/17/68 Paid	40.00
3/1/68 Paid	<u>\$ 228.58</u>
	10.00
3/9/68 Paid	<u>218.58</u>
	<u>10.00</u>
	<u>208.58</u>

MRS. JOHN M. PARKER,)
Plaintiff,)
vs.)
RICHARD ADAMS and)
RONALD J. ADAMS,)
Defendants.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 8163

DEMURRER

Comes now the Defendants in the above styled cause and demurs to the Bill of Complaint filed herein, and for grounds thereof assigns the following separately and severally:

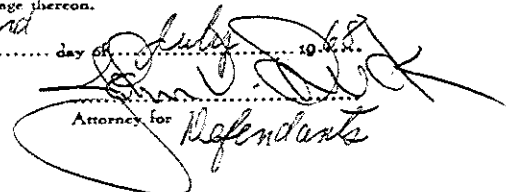
1. That the said itemized statement is not sworn to.
2. From aught that appears, the suit is one for rent and not an open account.


ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 3rd day of July 1968.


Attorney for Defendants

FILED

JUL 5 1968

ALICE J. DUCK CLERK
REGISTER

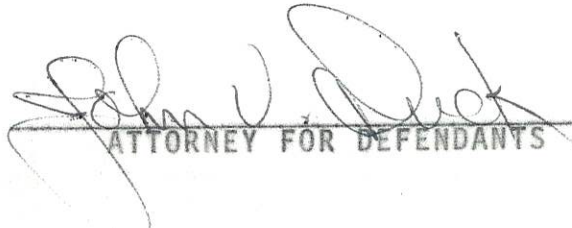
MRS. JOHN M. PARKER,)
Plaintiff,)
vs.)
RICHARD ADAMS and)
RONALD J. ADAMS,)
Defendants.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 8163

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1. That the said itemized statement is not sworn to.
2. From aught that appears, the suit is one for rent and not an open account.

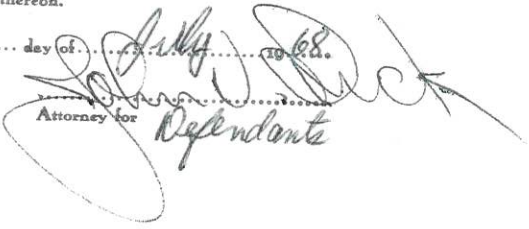

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 3rd day of July, 1968.

Attorney for


Defendants

Telephone: 928-9836-120

LAW OFFICES
E. G. RICKARBY
35 SOUTH SECTION STREET
FAIRHOPE, ALABAMA 36532

P. O. BOX 471

May 20, 1968

8163

C

O

P

Y

Honorable Taylor Wilkins
Sheriff, Baldwin County
Bay Minette, Alabama 36507

Dear Sheriff Wilkins:

Inre: Mrs. John M. Parker vs. Richard & Ronald J. Adams

Will you see that these papers are processed into Mobile
for service.

Mrs. Parker is a widow and needs this rent money.

Yours very truly,

EGR/jlb
Encl.
cc: Mrs. John M. Parker
5-31-68

Ronald and Richard Adams
 Amount Owed to
 Mrs. John M. Parker.

Rent:
 October, November, December 1967
 January, February 1968

	\$ 427.50
	11.99
Telephone	49.13
Payment on TV	37.46
Repair on TV	20.00
Clean Apartment & yard	\$ 546.08

Paid	277.50
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