

Our File No. 68-68

Your File No. _____

Law Offices

E. G. RICKARBY

35 SOUTH SECTION STREET
FAIRHOPE, ALABAMA 36532

CODE 205
Telephone: 928-9836

Mailing Address
P. O. BOX 471

July 19, 1968

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama 36507

no. 8222

Dear Mrs. Duck:

Inre: Ramos Shrimp Company vs. J. T. Duddy

Enclosed find Summons & Complaint in the above styled
cause, together with itemized and verified statement
of account and check for \$25.00 costs. Please hand
copy of same to Sheriff and have him advise when debtor
has been served. Thanks!

Yours very truly,



EGR/jlb

Encl.

cc: Forwarder

Dup.

8-5-68

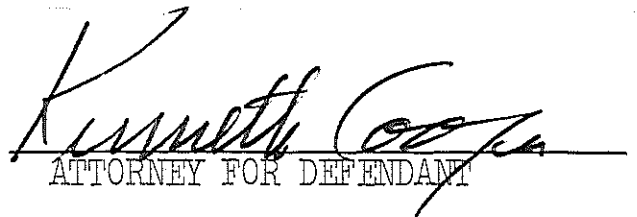
RAMOS SHRIMP COMPANY,
Plaintiff,
Vs.
J. T. DUDDY,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

D E M U R R E R

Comes now the Defendant, by his Attorney of record, and demurs to the Complaint heretofore filed in this cause, and as grounds therefor assign the following, separately and severally, to each and every count thereof, to-wit:

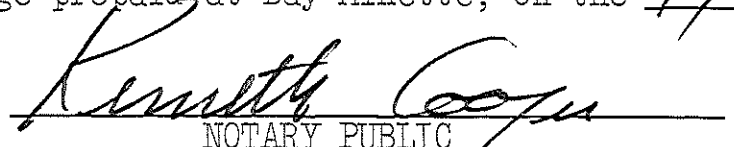
1. The complaint does not state a legal cause of action.
2. The complaint is vague.
3. The Complaint is uncertain.
4. The complaint is a mere conclusion of the pleades.


ATTORNEY FOR DEFENDANT

Defendant demands a trial
by Jury in this cause.


ATTORNEY FOR DEFENDANT

I certify that I have mailed a copy of the foregoing Demurrer to Honorable Elliott G. Rickarby, Bay Minette, Alabama, by depositing the same in United States Mail, Postage prepaid at Bay Minette, on the 14 day of August, 1968.


NOTARY PUBLIC
STATE AT LARGE, STATE OF ALABAMA

FILED

AUG 14 1968

ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA,
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,
CASE NO.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. T. DUDDY, 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 J. T. DUDDY, Defendant, by RAMOS SHRIMP COMPANY, Plaintiff.

WITNESS my hand this 22 day of July, 1968.

Beauford H. H. H. Clerk.

RAMOS SHRIMP COMPANY,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
VS.	X	BALDWIN COUNTY, ALABAMA,
J. T. DUDDY,	X	AT LAW.
Defendant.	X	8222

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant TWO HUNDRED SIXTY-FIVE AND 39/100 (\$265.39) DOLLARS due from him by account, on, to-wit, the 23rd day of June, 1967, 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 Defendant the sum of TWO HUNDRED SIXTY-FIVE AND 39/100 (\$265.39) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 23rd day of June, 1967, which sum of money with the interest thereon is still unpaid.

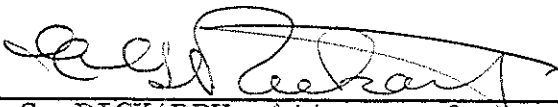
Count III.

The Plaintiff claims of the Defendant the sum of TWO HUNDRED SIXTY-FIVE AND 39/100 (\$265.39) DOLLARS due from him for merchandise, goods and

Page 2, Two Pages:

Summons & Complaint - Ramos Shrimp vs. Duddy

chattels sold by the Plaintiff to the Defendant between the 3rd day of June, 1967, and the 23rd day of June, 1967, which sum of money with the interest thereon is still unpaid.



E. G. RICKABY, Attorney for
Plaintiff.

Defendant's address is Route 3, Box 112-A, Foley, Alabama 36535.

FILED

JUL 22 1968

ALICE J. BOCK CLERK
REGISTER

Goley

NO. 8222

Ramos Shrimp Co.

US

J. T. Duddy

Served *22* day of *July* 19*68*
on *10th* day of *August* 19*68*
served a copy of the within *J. T. Duddy*
service on *Alma*

TAYLOR WILKINS, Sheriff

By M. Eastman
Goley, Ala.

TAYLOR WILKINS, SHERIFF OF BAYLOR
COUNTY, ALABAMA, CLAIMS \$1.00 EACH
FOR SERVING *1* PROCESS(ES) AND
TRAVEL EXPENSE ON EACH OF \$*7.24*
PROCESS(ES) OR A TOTAL OF \$*8.24*

FILED

JUL 22 1968

ALICE J. DUCK CLERK
REGISTER

COUNTY OF Mobile

SG-188 (13743)

STATE OF Alabama

Be it remembered, that on this 9 day of July
A. D., 1968, personally appeared before me, the undersigned authority,
Joseph S. Ramos known to me
who being duly sworn, upon his oath stated that he is sole owner
of Ramos Shrimp Company

~~{ a corporation organized and doing business under the laws of the State of~~
~~{ and has been duly authorized by said corporation to make this affidavit~~
~~{ a partnership composed of }~~

a sole trader doing business as Ramos Shrimp Company
and that as such he makes this affidavit; that he is familiar with the books and business of
said Ramos Shrimp Company; that the attached account against
J. T. Duddy of Foley, Alabama

is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
posing the said account were sold and delivered to said J. T. Duddy

at { ~~his~~
their } special instance and request, that credit has been duly given for all payments and
his
just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of Two Hundred Sixty-Five & 39/100 Dollars
(\$265.39) with interest from June 1 1967 is justly due and
remains unpaid.

Joseph S. Ramos (owner) X

I hereby certify under my official seal that I am authorized as a Notary Public to
administer oaths under the laws of the State of ALA
and that the foregoing was subscribed and sworn to before me on the day and year
first above stated.

[Signature]
Notary Public

Mobile State of ALA
A. D. 1971

BAYOU LA BATRE, ALA., 36509 June 1 1967

M.R. J. T. Duddy

90 RA 3 Bx 112-A Foley, Ma.

RAMOS SHRIMP COMPANY

WHOLESALE PRODUCERS AND BUYERS

QUICK FREEZE PLANT

FROM THE SEA TO CUSTOMER

FRESH AND
FROZEN SHRIMP

BREADED SHRIMP

TERMS: CASH OR
PAYABLE WEEKLY

P. O. BOX 578

PHONE 824-2149

[illegible]