

SINCLAIR-KOPPERS COMPANY,
a corporation,

Plaintiff

vs.

J. P. RICHMOND, individually
and doing business as TIDE-
WATER HOMES, whose correct
legal name is to the Plaintiff
unknown but will be substi-
tuted herefor when known,


Defendant.

* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA
*
* AT LAW
*
*
* CASE NO. 8409

DEMURRERS

Comes now the Plaintiff and demurs separately and severally
to the plea in abatement heretofore filed by the Defendant, and
as grounds therefore says as follows:

1. For that said plea does not abate the action.
2. For that said plea fails ti give a better writ.


E. Graham Gibbons
Attorney for Plaintiff

FILED

JAN 6 1969

ALICE J. DESK CLERK
REGISTER

SINCLAIR-KOPPERS COMPANY, a corporation,	:	IN THE CIRCUIT COURT OF
	:	BALDWIN COUNTY, ALABAMA
Plaintiff	:	
VS.	:	AT LAW
J. P. RICHMOND, individually and doing business as TIDEWATER HOMES, whose correct legal name is to the plaintiff unknown but will be sub- stituted herefor when known,	:	Case No. <u>8409</u>
	:	
Defendant	:	

PLEA IN ABATEMENT

Comes J. P. RICHMOND, Defendant in the above styled cause,
and appears solely and specially for the purpose of filing this Plea
in Abatement, and for no other purpose, and pleading in abatement says
as follows:

That he is not doing business as Tidewater Homes, nor has he
ever done so during all times mentioned in the Complaint.

Wherefore, Defendant says that this suit should be abated,
and should not be allowed to proceed.

J. P. Richmond
Defendant

STATE of ALABAMA,
COUNTY OF BALDWIN.

Before me, the undersigned authority, personally appeared
J. P. RICHMOND, who being duly sworn, deposes and says that he is the
person named in the foregoing Plea, that he is cognizant of the facts
set forth in said Plea, and that said facts are true and correct.

J. P. Richmond
Affiant

Subscribed and sworn to before me
this 9th day of December, 1968.

Carol B. Faudel
Notary Public, State of Alabama at Large

FILED

DEC 9 1968

ALICE J. DICK CLERK
REGISTER

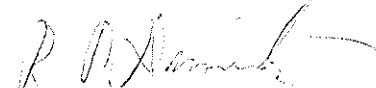
SINCLAIR COPPERS COMPANY, a	:	IN THE CIRCUIT COURT OF
Corporation,	:	BALDWIN COUNTY, ALABAMA
Plaintiff,	:	
VS.	:	AT LAW CASE NO. 8409
J. P. RICHMOND, Individually, and	:	
TIDE-WATER HOMES, INC., a Corpora-	:	
tion, Jointly and Individually,	:	
Defendants.	:	

PLEAS

Come the Defendants, separately and severally, in the above styled cause, and for answer, separately and severally, to the Complaint heretofore filed in said cause, as heretofore amended, file the following separate and several Pleas:

1. The allegations are untrue.
2. Defendant is not guilty.

HAMILTON, DENNISTON, BUTLER & RIDDICK

By 

Attorneys for Defendant
P. O. Box 1743
Mobile, Alabama 36601

Defendants demand a trial by jury of the above styled cause and of all issues thereunder.

HAMILTON, DENNISTON, BUTLER & RIDDICK

By 

Attorneys for Defendants

FILED

FEB 17 1969

ALICE J. DUCK CLERK
REGISTER

SINCLAIR-KOPPERS COMPANY,)
a corporation)

Plaintiff)

VS)

J. P. RICHMOND, individually)
and doing business as)
TIDEWATER HOMES, whose)
correct legal name is to)
the plaintiff unknown but)
will be substituted herefor)
when known)

Defendant)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Case No.

8409

Plaintiff claims of the defendant \$2,903.95 due from him by account on June 18, 1968, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized verified account, which will be offered in evidence at trial.

E. G. Gibbons
Attorney for Plaintiff

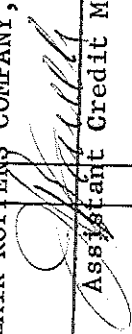
Serve the defendant at Stapleton, Alabama

FILED

OCT 20 1968

ALICE J. DUCK CLERK
REGISTER

Tidewater Homes
P.O. Box 118
Stapleton, Alabama 36578

DATE	DESCRIPTION	CHARGES	✓	CREDITS	BALANCE PAY LAST AMOUNT IN THIS COLUMN
BALANCE FORWARD					
9/7/67	130-4564	234.70			
10/11/67	506-878	281.91			
10/19/67	146-2070	28.77			
11/20/67	146-2476	519.99			
12/29/67	506-1160	621.48			
1/10/68	76-3	46.30			
2/23/68	506-96			184.88	
3/21/68	506-135	458.88			
4/16/68	506-180	385.09			
5/6/68	506-224	488.29			
5/6/68	130-3220			32.59	
6/18/68	506-304	56.01			2,903.95**
I hereby certify that the above bill is correct and just and that payment therefore has not been received. SINCLAIR-KOPPERS COMPANY,					
 Assistant Credit Manager					

Subscribed and sworn to before me this
17th day of October 1968.



Notary Public

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 J. P. Richmond, ind and d/b/a
Tidewater Homes

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. P. Richmond, ind and d/b/a Tidewater Homes..... Defendant.....

by Sinclair-Koppers Company

..... Plaintiff.....

Witness my hand this.....30.....day of.....October.....19 68.....

.....*Allice A. Quack*..... Clerk

24/11-8-68

No. 8409 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

SINCLAIR -KOPPERS COMPANY , a corp

Plaintiffs

vs.

J. P. RICHMOND, Ind. and d/b/a
TIDEWATER HOMES Defendants

SUMMONS AND COMPLAINT

Filed 10-30- 19 68

Alice J. Duck Clerk

Gibbons and Stokes

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received in Office

OCT 30 1968

19

WALTER WILKINS

Sheriff

I have executed this summons

this

Nov 8 1968

by leaving a copy with

J. P. Richmond

Sheriff claims

24

miles at

Ten Centimeter mile Total \$ 246

W. M. SINS Sheriff

BY

W. M. SINS

SHERRIFF

Walter Wilkins Sheriff

W. A. Zolt Deputy Sheriff

Shopele

SINCLAIR-KOPPERS COMPANY,
a corporation

Plaintiff

VS

J. P. RICHMOND, individually
and d/b/a TIDEWATER HOMES,
whose correct legal name is
to the plaintiff unknown but
will be substituted herefor
when known

Defendant

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA.

AT LAW.

CASE NO. 8409

AMENDMENT

Comes now the plaintiff and amends the caption and
complaint heretofore filed as follows:

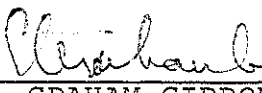
SINCLAIR-KOPPERS COMPANY,
a corporation

Plaintiff

vs

J. P. RICHMOND, individually
and TIDEWATER HOMES, INC.,
a corporation, jointly and
individually

Defendants


E. GRAHAM GIBBONS
ATTORNEY FOR PLAINTIFF
P.O. Box 293 Mobile

CERTIFICATE OF SERVICE

I certify that on this 7 day of Feb,
1969, a copy of the foregoing pleading has been
served upon counsel for all adverse parties in this
proceeding by mailing the same to each by first class
U. S. mail, properly addressed and postage prepaid.


ATTORNEY FOR

FILED
FEB 10 1969
ALICE J. DUCK
CLERK
REGISTER