

JOHN P. BEEBE  
ATTORNEY AT LAW  
ROBERTSDALE, ALABAMA

March 6, 1969.

Mrs. Alice J, Duck, Clerk,  
Circuit Court, Baldwin County,  
Bay Minette, Alabama.

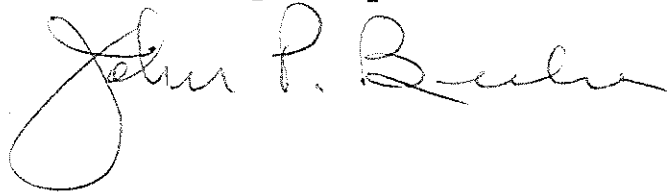
Re: Raymond Clifford Havel, vs  
Leonard C. Havel, Case No. 8548

Dear Mrs. Duck:

I enclose answer of the Defendant in the above styled cause,  
which answer demands a jury trial. Please file same in this cause.

I am today mailing a copy of said answer to Mr. Kenneth  
Cooper, Bay Minette, Alabama, the attorney for the Plaintiff.

Yours very truly,

A handwritten signature in cursive script, reading "John P. Beebe". The signature is written in dark ink and is positioned below the typed name "John P. Beebe".

encl  
cc to: Mr. Kenneth Cooper,  
Bay Minette, Alabama.

ORIGINAL

SUMMONS AND COMPLAINT

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
CASE NO. \_\_\_\_\_  
\_\_\_\_\_ TERM, 1969

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon Leonard C. Havel to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court, State of Alabama, at Bay Minette, against Leonard C. Havel, Defendant, by Raymond Clifford Havel, Plaintiff.

WITNESS my hand this 28 day of June, 1969.

Alie J. Havel, CLERK.

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RAYMOND CLIFFORD HAVEL,	I	IN THE CIRCUIT COURT OF
Plaintiff,	I	BALDWIN COUNTY, ALABAMA
Vs.	I	AT LAW
LEONARD C. HAVEL,	I	CASE NO. <u>6548</u>
Defendant.	I	

COUNT ONE:

The Plaintiff claims of the Defendant Six Hundred Forty-Four and 87/100 (\$644.87) Dollars, damages for the breach of a covenant, or agreement entered into by him on or about the 1st day of March, 1967, in substance as follows, to-wit:

Defendant, together with Plaintiff and the three other heirs of their deceased father, Ed. J. Havel, who died intestate in 1966, signed certain legal documents permitting Garfield Hayes and Zena Hayes, who were indebted to the deceased Ed. J. Havel in the sum of Three Thousand Two Hundred Thirty-Four and 26/100 (\$3,234.26) Dollars, to pay off said indebtedness to the Defendant, as agent for all the heirs of Ed. J. Havel, Deceased, and upon receipt of said sum Defendant agreed to disburse one-fifth (1/5) thereof to Plaintiff as his legal share of said sum due to the Estate of Ed. J. Havel, Deceased, and to make similar disbursements to the other heirs thereof; the said Garfield Hayes and Zena Hayes did pay to the Defendant the aforementioned sum of Three Thousand Two

Hundred Thirty-Four and 26/100 (\$3,234.26) Dollars, on or about the month of October, 1968, but the Defendant has failed, and refused, though requested to do so, to pay Plaintiff his one-fifth (1/5) or Six Hundred Forty-Four and 87/100 (\$644.87) Dollars as agreed. Plaintiff says that although he has complied with all its provisions on his part, the Defendant has failed to comply with the following provisions thereof, viz, he has refused to pay to Plaintiff his one-fifth (1/5) interest in the aforementioned Three Thousand Two Hundred Thirty-Four and 26/100 (\$3,234.26) Dollars, hence this suit in the amount sued for.

*Kenneth Cooper*  
ATTORNEY FOR PLAINTIFF

Defendant's Address:  
Silverhill, Alabama

**FILED**

JAN 28 1969

**ALICE J. DUCK** CLERK  
REGISTER

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CASE NO.

8548

DEFENDANT'S ADDRESS:

Silverhill, Alabama

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RAYMOND CLIFFORD HAVEL,

PLAINTIFF,

VS.

LEONARD C. HAVEL,

DEFENDANT.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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ATTORNEY FOR PLAINTIFF:

KENNETH COOPER

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**ORIGINAL  
FILED**

JAN 28 1969

**ALICE J. DUCK** CLERK  
REGISTER

Received 28 day of Jan 1969

and on 8 day of Feb 1969

I served a copy of the within NC

on Leonard C. Havel

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By Hall D. S.

*Robert Hall*

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY \_\_\_\_\_  
DEPUTY SHERIFF

AT LAW.      No. 8548

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