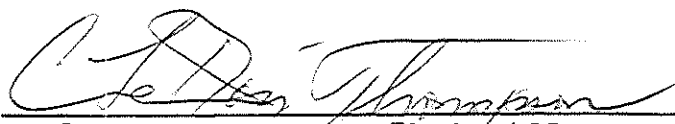


VETA W. SKIPPER,	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS.,	X	AT LAW
BAY MINETTE EGG	X	CASE NO. 8589
CO., INC.,	X	
DEFENDANT.	X	

Comes the Plaintiff in the above styled cause and propounds the following interrogatories to the defendant Bay Minette Egg Company, Inc.:

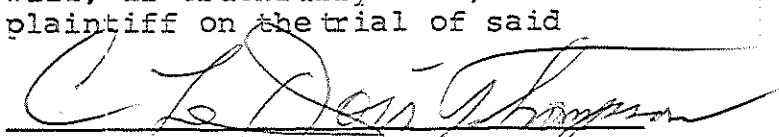
1. To the person answering the above interrogatories for the defendant corporation: State your name.
2. State the names and addresses of the officers and directors of Bay Minette Egg Company Inc. together with their titles.
3. State the names of stockholders in Bay Minette Egg Company, Inc. and the number of shares of capital stock held by each.
4. State the business of the Bay Minette Egg Company, Inc. as to the items purchased or packaged and the names and addresses of the companies or individuals to whom sales were made during the period between March 30 to August 24, 1967, inclusive.

  
Attorney for the Plaintiff.

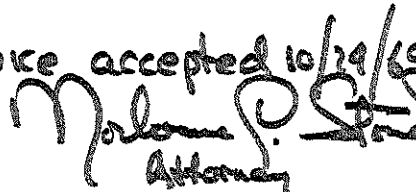
STATE OF ALABAMA  
BALDWIN COUNTY

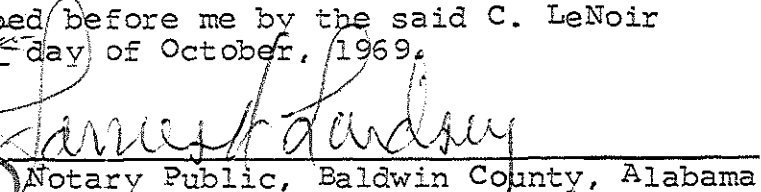
Before me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on oath and says as follows:

My name is C. LeNoir Thompson and I am the attorney of record for the plaintiff in the above entitled cause, and as such, I am authorized to make this affidavit. I further state that the answer of the defendant to the foregoing interrogatories will, if truthfully made, be material evidence for the plaintiff on the trial of said cause.



Sworn to and subscribed before me by the said C. LeNoir Thompson on this the 24 day of October, 1969.

Service accepted 10/24/69  
  
Notary Public, Baldwin County, Alabama

  
Notary Public, Baldwin County, Alabama

FILED

OCT 29 1969

CLERK  
REGISTER  
ALICE J. DUCK

VETA W. SKIPPER,                    )((  
                                  PLAINTIFF,                   )((  
                                  VS.,                                   )((  
  AT LAW  
BAY MINETTE EGG CO., INC.,   )((  
                                  DEFENDANT.                   )((  
  CASE NUMBER:       8589

SUPPLEMENTAL INTERROGATORIES

Comes the Plaintiff in the above styled cause and propounds the following additional interrogatories to the Defendant, Bay Minette Egg Company, Inc.,:

1. To the person answering the above interrogatories for the defendant corporation: State your name.

2. State the names and addresses of the officers and directors of Bay Minette Egg Company, Inc. together with their titles.

3. State the names of stockholders in Bay Minette Egg Company, Inc. and the number of shares of capital stock held by each.

4. State the business of the Bay Minette Egg Company, Inc. as to the items purchased or packaged and the names and addresses of the companies or individuals to whom sales were made during the period between March 30 to August 24, 1967, inclusive.

5. Do the payrolls of the Bay Minette Egg Company, Inc. reflect the employment of the Plaintiff from March 30, 1967, to August 24, 1967?

6. State the gross annual dollar volume of revenue since March 30, 1967.


7. State the names and addresses of all employees of Bay Minette Egg Company, Inc. since March 30, 1967, the dates of their employment, and what their duties consisted of.

8. State the total number of hours worked by the Plaintiff herein each week during the term of her employment and the amount of her paycheck.

9. State whether the amount paid the Plaintiff included any overtime worked.

10. State for the period during March 30 to August 24, 1967, what shipments made by Bay Minette Egg Company, Inc. went directly into interstate commerce and billed to out of state customers.

11. State what shipments were billed to buyers in Alabama and shipped directly to other points outside the State of Alabama.

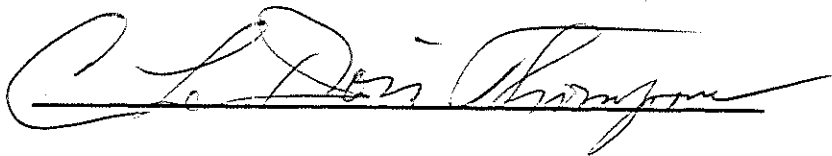
  
Attorney for Plaintiff.

STATE OF ALABAMA

BALDWIN COUNTY

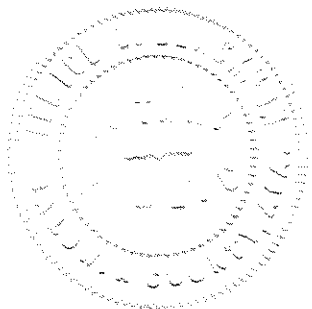
Before me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on oath and says as follows:

My name is C. LeNoir Thompson and I am the attorney of record for the plaintiff in the above entitled cause, and as such, I am authorized to make this affidavit. I further state that the answer of the defendant to the foregoing interrogatories will, if truthfully made, be material evidence for the plaintiff on the trial of said cause.



Sworn to and subscribed before me by the said C. LeNoir Thompson on this the 14 day of January, 1970.

  
Notary Public, Baldwin County, Alabama.




FILED

JAN 14 1970

ALICE J. DUCK

CLERK  
REGISTER

Service Accepted 1/20/70

  
Attorney for Defendant

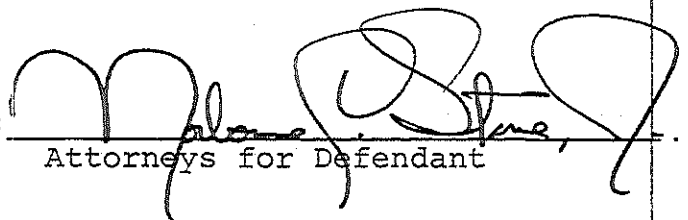
VETA W. SKIPPER,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
BAY MINETTE EGG	X	AT LAW
CO., INC.,	X	NO: 8589
	X	
Defendant,	X	

Comes now the Defendant in the above styled cause, by its attorneys, and for answer to the Complaint heretofore filed against it and to each paragraph or section thereof, separately and severally, pleads as follows:

1. The allegations of the Complaint are untrue.

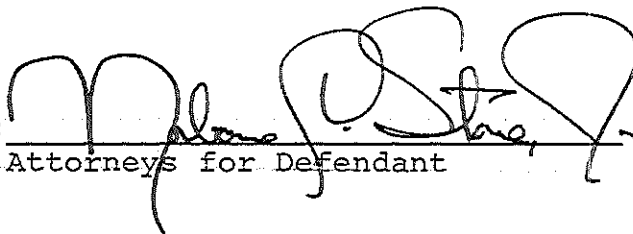
Respectfully submitted,

CHASON, STONE & CHASON

By:   
Attorneys for Defendant

The Defendant respectfully demands a trial of this cause by a jury.

CHASON, STONE & CHASON

By:   
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 17 day of March, 1969



**FILED**

MAR 18 1969

**ALICE J. DUCK** CLERK  
REGISTER

VETA W. SKIPPER

Plaintiff

vs

BAY MINETTE EGG CO., INC.,

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

85-89

I

Plaintiff brings this action to recover from defendant unpaid minimum wages and unpaid overtime compensation in the amount of Two Hundred Eighty-five and 88/100 (\$285.88) Dollars and an additional equal amount as liquidated damages and a reasonable attorney's fee, pursuant to Section 16 (b) of the Fair Labor Standards Act of 1938 (52 Stat. 1060, as amended; 29 U.S.C. 201, et seq.), hereinafter referred to as the Act.

II

Defendant is, and at all times hereinafter mentioned was, a corporation organized under and existing by virtue of the laws of the State of Alabama, having a place of business and processing and/or packing plant near the City of Bay Minette, County of Baldwin, State of Alabama, within the jurisdiction of this Court, and is, and at all times hereinafter mentioned was, engaged at that place of business in the packaging, grading, sale and distribution of eggs.

III

During the workweeks in the period beginning March 30, 1967, and ending August 24, 1967, the eggs graded, packaged, sold and distributed at and from defendant's said place of business has been procured and received from points within the State of Alabama, and graded and packaged for shipment, transportation, delivery and sale to points outside the State of Alabama.

IV

At its said place of business near Bay Minette, Alabama, during the period beginning March 30, 1967, and ending August 24, 1967, the defendant employed the plaintiff

as a packer and grader. The duties performed by the plaintiff for the defendant consisted of candling, grading and packing and otherwise handling eggs received from within the State of Alabama. The plaintiff was thus employed in commerce within the meaning of the Act.

V

During the period from March 30, 1967, to August 24, 1967, defendant employed plaintiff at its said place of business in commerce and in the production of goods for commerce, within the meaning of the Act, as aforesaid, and failed and refused to compensate plaintiff for such employment, as required by Section 6(a) (1) of the Act, at a rate not less than One Dollar and Twenty-five cents (\$1.25) an hour.

VI

During the period from March 30, 1967, to August 24, 1967, defendant employed plaintiff in commerce and in the production of goods for commerce, as aforesaid, for workweeks longer than forty (40) hours and failed and refused to compensate her for such employment in excess of forty (40) hours in such workweeks, at rates not less than one and one-half times the regular rates at which she was employed, as required by Section 7 of the Act.

VIII

During the period from March 30, 1967, to August 24, 1967, defendant employed plaintiff in its said place of business, as aforesaid. Plaintiff was accordingly underpaid the sum of \$285.88 for this said period.

WHEREFORE, plaintiff prays that judgment be awarded her in the amount of Two Hundred Eighty-five and 88/100 Dollars (\$285.88) for unpaid minimum wage and overtime compensation and for an additional equal amount as liquidated damages, together with costs, and that the Court allow plaintiff a reasonable attorney's fee to be paid by the defendant.

Veta W. Shipper

C. LeNoir Thompson  
Attorney for Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Veta W. Skipper, who being informed of the contents of foregoing complaint says under oath that the facts stated therein are true and correct.

  
Helen McDowell  
Notary Public, Baldwin County, Alabama

FILED

FEB 27 1969

ALICE J. DUCK CLERK  
REGISTER

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 Bay Minette Egg Co., Inc.

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.....

Bay Minette Egg Co., Inc......, Defendant.....

by Veta W. Skipper.....

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

Witness my hand this 27 day of Feb 1969  
Alice J. Clark Clerk



No. 8589

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Veta W. Skipper  
Plaintiffs

vs.

Gay Minette Egg Co.  
Inc.  
Defendants

SUMMONS AND COMPLAINT

Filed FILED 19.....

FEB 27 1969 Clerk

ALICE J. DUCK

CLERK  
REGISTER

C. L. Thompson  
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

**RECEIVED**  
Received in Office

FEB 28 1969 19.....

[Signature] Sheriff

I have executed this summons

this March 3 1969

by leaving a copy with

Gay Minette Egg  
Company, Inc.

TAYLOR WILKINS, SHERIFF OF BALDWIN  
COUNTY, ALABAMA, CLAIM \$1.50 EACH  
FOR SERVING \_\_\_\_\_ PROCESS(ES) AND  
TRAVEL EXPENSE ON EACH OF \$\_\_\_\_\_  
PROCESS(ES) OR A TOTAL OF \$\_\_\_\_\_

Taylor Wilkins Sheriff  
H. I. Brown Deputy Sheriff  
10 miles R.T.