

OTIS L. BAGGETT, ¶ IN THE CIRCUIT COURT OF
Plaintiff, ¶ BALDWIN COUNTY, ALABAMA

Vs. ¶ AT LAW

IDELLA VALREE, ¶ CASE NO. 8808
Defendant. ¶

DEMURRER

Comes now the Defendant and demurs to the complaint heretofore filed in this cause, and assigns as reasons therefor the following, separately and severally, to each and every count thereof:

1. The complaint is vague;
2. The complaint is uncertain; and
3. The complaint does not state a legal cause of action.

Kenneth Cooper
ATTORNEY FOR DEFENDANT

Defendant demands trial by jury
in this cause.

Kenneth Cooper
ATTORNEY FOR DEFENDANT

I certify that I have mailed a copy of the foregoing DEMURRER to Hon. John Earl Chason, Attorney At Law, Bay Minette, Alabama, postage prepaid, on this 18 day of August, 1969.

Kenneth Cooper
ATTORNEY FOR DEFENDANT

FILED

AUG 19 1969

ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Idella Valree to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of Otis L. Baggett.

WITNESS my hand this 17 day of July, 1969.

Alice J. Duck
Clerk

OTIS L. BAGGETT,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
IDELLA VALREE,	X	AT LAW
Defendant.	X	<i>No. 8808</i>

The Plaintiff claims of the Defendant the sum of Three Hundred Eighty-six Dollars and Eighty-six Cents (\$386.86) due by promissory note made by her on the 28th day of March, 1969, and payable on demand, with interest thereof.

CHASON, STONE & CHASON

By: *John E. Chason*

FILED

JUL 16 1969

ALICE J. DUCK

CLERK
REGISTER

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247-22-69

Received 17 day of July 1969
and on 22 day of July 1969
I served a copy of the within etc
on Idella Valree

BY SERVICE ON

TAYLOR WILKINS Sheriff
By W. A. Wilkins
D. Wilkins 4

Sheriff claims 4 miles at
Ten Cents per mile Total \$ 40
TAYLOR WILKINS, Sheriff
BY Robert DEPUTY SHERIFF

~~500~~
500 ff
No. 8808

OTIS L. BAGGETT,
Plaintiff,

VS.

IDELLA VALREE,
Bay Minette
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA