

FRED CHARLES DUNAWAY
COMPLAINANT
VS
GEORGIA RAMSEY, d/b/a
PARADISE BEACH CASINO
RESPONDENT

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY
NO. 4430

Comes now the Respondent in the above styled cause and demurs to the Complainant's Complaint and for grounds therefor says as follows:

1.

There is no equity in the bill.

2.

The lien filed in the Probate court on which this claim is based is not drawn with sufficient particularity.

3.

The verification of the lien on which this suit is based is not in proper form.

4.

The Complaint fails to allege what tract of land he is claiming a lien on.

5.

The Complainant is seeking a lien on the land in excess of the amount allowed by law.

Wilters & Brantley

BY:

Albert M. Brantley
Solicitors for the Respondent

The Respondent requests a trial by jury.

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DEMURRERS

FILED
NOV 24 1958
ALICE J. DUCK, Register