

121

WILTON L. WAINWRIGHT,
Plaintiff,
VS.
W. R. STUART,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

Comes the Defendant and demurs to the Plaintiff's
original complaint in this cause, and to each count thereof,
separately and severally says:

FIRST:

That said complaint does not state a cause of
action.

SECOND:

That said complaint, on its face, shows that it
is barred by the statute of limitation.

W. R. Stuart
Defendant.

121)

~~SECRET~~
sub

Filed, Jan 25, 1935
Robert S. Deek
Clerk

The State of Alabama, BALDWIN County

CIRCUIT COURT

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon W. R. Stuart

to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur, within thirty days from service hereof to the complaint of Wilton L. Wainwright

Witness, my hand this 19 day of January 1935
Ralph L. Wainwright Clerk.

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT.

COMPLAINT

<u>Wilton W. Wainwright</u>	VS.	<u>W. R. Stuart</u>
Plaintiff.....		Defendant.....

The Plaintiff claims of the Defendant Three hundred Dollars, due for money had and received of the plaintiff by the defendant, May 25, 1931 which said sum of money, together with the interest thereon is still due and unpaid.

Frank L. Wainwright
Attorney for Plaintiff

Original

No. 121 ~~121~~

The State of Alabama

Baldwin COUNTY

CIRCUIT COURT

Wilton L. Wainwright
Plaintiff.....

vs.

W.R. STUART,
Defendant.....

SUMMONS AND GENERAL COMPLAINT

Filed this 19th day of

January 1935

Robert H. Clark
Clerk.

Frank E. Harris
Plaintiff's Attorney.

Received this..... day of

19.....

Sheriff.

Executed this 19th day of

Jan 1935

by leaving a copy ~~RECORDED~~ within Summons and

Complaint, with

W. R. Stuart
Defendant.....

M. H. Wilkins
Sheriff.

The State of Alabama

.....COUNTY

To the Sheriff of.....County:

Whereas, the Plaintiff.....in the within stated cause has.....made affidavit and given bond as required by law, you are hereby required to take the property mentioned in the Complaint into your possession, unless the Defendant..... give..... bond payable to the Plaintiff..... with sufficient surety in double the amount of the value of the property, with condition that if the defendant.....

cost in the suit.....
within thirty days thereafter, deliver the property to the Plaintiff..... and pay all costs and damages which may accrue from the detention thereof.

.....
Clerk.