

CANTERBURY MOTOR COMPANY, a  
Corporation existing under  
the Laws of the State of  
Alabama,

Plaintiff,

vs.

L. D. WHATLEY,

Defendant.

At Law, No. 275

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

FALL TERM, 1936

AMENDED COMPLAINT

Comes the Complainant, Canterbury Motor Company,  
a Corporation existing under the Laws of the State of Ala-  
bama, Plaintiff in the above styled cause, and Amends the  
Original Bill of Complaint so that it shall read as follows:

"The Plaintiff claims of the Defendant the sum of  
Seventy and no/100 Dollars, due by Promissory Note made by  
him on the 6th day of March, 1930, and payable Eleven and  
no/100 Dollars each month beginning April 6, 1930, until  
twelve such payments of Eleven and no/100 Dollars each, with  
interest at 8% per annum from maturity, shall have been paid,  
the said Promissory Note's being of the face value of One  
Hundred Thirty Two and no/100 Dollars, of which the sum of  
Seventy and no/100 Dollars is claimed as due, with interest  
thereon from the 21st day of January, 1932, together with the  
costs of this suit."

Leslie Hall  
LESLIE HALL, Attorney for the Plaintiff.

Receipt of a copy of the above "Amended Complaint"  
is hereby acknowledged, and we do hereby ~~waive~~ <sup>Waive</sup> ~~notice and waive any~~  
~~other or further notice thereof.~~ <sup>notice of same.</sup> To-wit, this 24<sup>\*</sup> day of  
July, 1936.

Hyatt & Mason  
Attorneys for the Defendant.

At Law, No. 275

*Duck*  
RECORDED  
7-572

CANTERBURY MOTOR CO.,  
A Corporation existing  
under the Laws of the  
State of Alabama,

Plaintiff,

vs.

L. D. WHATLEY,

Defendant.

AMENDED COMPLAINT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA.

FALL TERM, 1936.

Filed this 24<sup>th</sup> day of

July, 1936.

Robert L. Duck  
Clerk.

CANTERBURY MOTOR COMPANY,  
A Corporation existing under  
the Laws of the State of Ala-  
bama,

Plaintiff,

-vs-

L. D. WHATLEY,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

Comes the Defendant in the above styled cause and for  
Answer to the Amended Complaint filed in said cause, says:-

That the allegations of the Complaint are untrue.

Deputy & Hesson  
Attorneys for Plaintiff.

RECORDED

*Duch*  
8-205

ANSWER.

CANTERBURY MOTOR COMPANY,  
A Corporation existing under the  
Laws of the State of Alabama,

Plaintiff,

-vs-

L. D. WHATLEY,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

Filed August 19, 1937

*R. A. Duck*  
Clerk.

SUMMONS

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT  
FALL TERM, 1936; At Law, No. 275

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To Any Sheriff of the State of Alabama, Greeting:

You are hereby commanded to summon L. D. WHATLEY,  
located at Civilian Conservation Corps Camp, Georgiana, Ala-  
bama, to appear within thirty days from the service of this  
writ, in the Circuit Court of Baldwin County, Alabama, at the  
place of holding the same, then and there to answer the Com-  
plaint of the Canterbury Motor Company, a Corporation organized  
under the Laws of the State of Alabama.

Witness my hand this 30 day of June, 1936.

Robert S. Duck  
Clerk of the Circuit Court.

COMPLAINT

CANTERBURY MOTOR COMPANY, a  
Corporation existing under the  
Laws of the State of Alabama,  
Plaintiff,

vs.

L. D. WHATLEY,

Defendant.

) At Law, No. 275  
:) IN THE CIRCUIT COURT  
:) BALDWIN COUNTY, ALABAMA,  
:) FALL TERM, 1936.

Suit on a Promissory Note

The Plaintiff claims of the Defendant the sum of  
Seventy and no/100 Dollars, due by Promissory Note made by him  
on the 6th day of March, 1930, and payable Eleven and no/100  
Dollars each month beginning April 6, 1930, until twelve such  
payments, with interest at 8% per annum from maturity, have been  
paid, on which the last payment was made January 21, 1932,  
leaving a balance due of Seventy and no/100<sup>Dollars</sup>, with interest thereon  
from the 21st day of January, 1932, together with the costs of  
this suit: and so justly and lawfully demand of him.

Leslie Hall  
LESLIE HALL, Attorney for the Plaintiff.

(188)

Rec in office 7/2/36  
M. H. Walker  
Sherriff

Executed the  
within Summons  
Complaint by serving  
a copy of the within  
on L. D. Whatley this  
the 6<sup>th</sup> day of July  
1936.

Geo. T. Autrey Sheriff  
B. J. Bargar C. D. S.  
Butler Co. Ala

We the jury  
for the plaintiff  
verdict in favor of  
at \$161.41  
W. B. Black  
Foreman

Duck  
No. 273

7-508

CANTERBURY MOTOR COMPANY,  
A Corporation,  
Plaintiff,  
vs.

L. D. WHATLEY,  
Defendant.

SUMMONS AND COMPLAINT  
ON PROMISSORY NOTE

CIRCUIT COURT  
BALDWIN COUNTY  
ALABAMA

FALL TERM, 1936, At Law

Filed in office this 30<sup>th</sup>  
day of June, 1936.  
Robert S. Duck  
Clerk of Circuit Court.

LESLIE HALL  
ATTORNEY AT LAW  
BAY MINETTE, ALABAMA

CANTERBURY MOTOR COMPANY,  
a Corporation existing  
under the Laws of the State  
of Alabama,

Plaintiff,

-vs-

L. D. WHITLEY,

Defendant.

IN THE CIRCUIT COURT--AT LAW

STATE OF ALABAMA

BALDWIN COUNTY.

Now comes the Defendant and files this, his Demurrer to  
the Complaint in this cause, and assigns as grounds therefor:-

1st. That said Complaint states no cause of action.

2nd. That said Complaint shows on its face that said  
demand which is the basis of the suit has been duly paid.

3rd. That said Complaint is vague and indefinite, and  
uncertain as to the amount due thereon.

*Hybart & Chason*  
Attorneys for Defendant.

Defendant demands a trial  
of this cause by Jury.

*Hybart & Chason*  
Attorneys for Defendant.

RECORDED

4-512

DEMURRER.

CANTERBURY MOTOR COMPANY,  
A corporation organized  
and existing under the laws  
of the State of Alabama,

Plaintiff,

-VS-

L. D. WHITNEY,

Defendant.

IN THE CIRCUIT COURT-AT-LAW  
STATE OF ALABAMA  
BALDWIN COUNTY.

Filed July 24<sup>th</sup>, 1936

Robert S. Duck  
Clerk

Demurrer rejected to Complaint  
as amended this 3<sup>rd</sup> day

7. August 1936

Robert S. Duck  
Clerk