

566

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are commanded to summon George C. Meyer to appear within thirty (30) days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Foley Hardware Company.

WITNESS MY HAND this 28th day of February, 1939.

R. S. DUCK

clerk, - register

By Walter H. Clark

Deputy

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FOLEY HARDWARE COMPANY, A CO-
PARTNERSHIP COMPOSED OF LOUISE
LAWRENZ, MARGARET LAWRENZ, AND
M. K. LAWRENZ,

Plaintiff

vs.

GEORGE C. MEYER.

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW


COMPLAINT

(1) Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY & 47/100 (\$130.47) DOLLARS for repairs and material furnished by the Plaintiff as an original contractor in the repair and improvement, by the installation of electric wiring and electric light fixtures in the buildings located upon lots seven (7), eight (8), nine (9), and ten (10) in block one (1) and lots one (1) and two (2) in block two (2) all in unit one (1) of Gulf Shores an addition in Baldwin County, Alabama, as surveyed, platted and recorded with the interest thereon from the first day of September, 1938

(2) Plaintiff avers that within six (6) months after the said indebtedness accrued and, to wit: On the 29th day of September, 1938 it filed in the office of the Judge of Probate of Baldwin County, a statement in writing, verified by the oath of M. K. Lawrenz, he being a person having knowledge of the facts, which said statement contained the amount of the demand secured by the lien after all

just credits had been given, a description of the property on which the lien is claimed and the name of the Defendant as the owner thereof.

(3)Wherefore Plaintiff claims a lien upon lots seven (7), eight(8), nine (9), and ten (10) in block one (1) and lots one (1) and two (2) in block two (2) all in unit one (1) of Gulf Shores an addition in Baldwin County, Alabama, as surveyed, platted and recorded and said lien is claimed separately and severally as to both the buildings and improvements thereon, and the said land, in the amount of ONE HUNDRED THIRTY & 47/100 (\$130.47) DOLLARS with the interest thereon.



Attorney for Plaintiff

10/3/39 *Burstein*

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

FOLEY HARDWARE COMPANY, A
CO-PARTNERSHIP COMPOSED OF
LOUISE LAWRENZ, MARGARET
LAWRENZ, AND M. K. LAWRENZ,

Plaintiff

VS.

GEORGE C. MEYER,

Defendant

111 St. Michaels, St.,
Mobile, Ala.

SUMMONS AND COMPLAINT

Filed February 28, 1939
R. S. DUCK
clerk, & register

By *Charles Thompson*
Deputy

LLOYD A. MAGNEY
ATTORNEY AT LAW
FOLEY, ALABAMA

Received 3 Day of March 1939
and on 6 Day of March 1939
I served a Copy of the within S & C
on George C. Meyer
by service on _____

W. H. HOLCOMBE, Sheriff
By W. Burstein D.S.

FOLEY HARDWARE COMPANY, A CO-
PARTNERSHIP COMPOSED OF LOUISE
LAWRENZ, MARGARET LAWRENZ AND
M. K. LAWRENZ,

Plaintiff,

VS.

GEORGE C. MEYER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

DEMURRER.

Now comes the Defendant in the above entitled cause, and
for demurrer to the Complaint and to each and every count thereof,
separately and severally, sets down and assigns the following sep-
arate and several grounds, to-wit:

1. It does not state a cause of action.
2. No sufficient facts are alleged to entitle the Plaintiff
to a lien.
3. It does not allege or show any contract between the
Plaintiff and the Defendant whereby Defendant is liable to the
Plaintiff in any sum for the matters and things set forth therein.
4. No contract between the Plaintiff and the Defendant is
alleged.
5. It is not shown that the installation of the electric
wiring and light fixtures was done under agreement between the
Plaintiff and the Defendant as the owner of the said property.
6. It does not allege or show that the Defendant is the
owner of the said property.
7. No privity between the Plaintiff and the Defendant is
shown.

J. T. S. T. Blackburn
Attorney for Defendant.

Defendant demands a trial of said
cause by jury.

J. T. S. T. Blackburn
Attorney for Defendant.

DEMURRER.

POLEY HARDWARE COMPANY, a Co-
Partnership composed of Louise
Lawrenz, Margaret Lawrenz and
W. K. Lawrenz,

Plaintiff,
VS.

GEORGE C. MEYER,
Defendant.

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

Filed April 6, 1934
R. S. DUCK
clerk, - registered

By *Pauline H. Hester*
Deputy.