

732

J. C. GRIMES, Operating and doing
business as LOXLEY PRODUCE COMPANY,

Plaintiff,

VS.

THOMAS JERKINS, JR.,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

DEMURRER

Now comes the Defendant in the above entitled cause and
demurs to the Complaint and to each and every count thereof separately
and severally, and as grounds therefor, sets down and assigns separately
and severally the following:

- 1: It does not state a cause of action.

J. B. Blashum
Attorney for Defendant.

Defendant demands a trial of said
cause by jury.

J. B. Blashum
Attorney for Defendant.

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DEMURRER

J. C. GRIMES, Operating and doing
business as LOXLEY PRODUCE COMPANY

Plaintiff,

VS.

THOMAS JERKINS, JR.,

Defendant.

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

Filed 8-18-42

R. D. Buck
Clerk

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED to summon THOMAS JERKINS, JR. 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 the same, then and there to answer the Complaint of J. C. Grimes, operating and doing business as Loxley Produce Company.

Witness my hand this 30 day of January, 1942.

R. L. Duck
Clerk.

J. C. GRIMES, Operating and doing
business as LOXLEY PRODUCE COMPANY,

PLAINTIFF,

VS.

THOMAS JERKINS, JR.

DEFENDANT.

: IN THE CIRCUIT COURT OF

: BALDWIN COUNTY, ALABAMA,

: AT LAW.

FIRST:

The Plaintiff claims of the Defendant TWO HUNDRED THIRTY-FIVE & 60/100 (\$235.60) DOLLARS, due from him by account on to-wit, the first day of January, 1942, which sum of money with the interest thereon is still due and unpaid.

SECOND:

The Plaintiff claims of the Defendant TWO HUNDRED THIRTY-FIVE & 60/100 (\$235.60) DOLLARS, on account stated between the Plaintiff and the Defendant on, to-wit, the first day of January, 1942, which sum of money with interest thereon, is still due and unpaid.

B. L. Duck
Attorney for the Plaintiff.

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J. C. GRIFFS, Operating and doing
business as LONLEY PRODUCE CO.,

PLAINTIFF,

VS.

THOMAS JENKINS, JR., DEFENDANT.

SUMMONS & COMPLAINT

Filed 30 Jan 42
Dadger

BEEBE & HALL, LAWYERS,
Bay Minette, Ala.

RECORDED

Received in Sheriff's Office
this 30 day of January 1942
W. R. STUART, Sheriff

Executed this 19th day
of Feb 1942 by
Leaving a copy of
with Mr. Thomas on
Thomas Jenkins Jr.

W. R. Stuart
Shirley
B. H. Johnson
J. H.

J. C. GRIMES, Operating and doing
business as LOXLEY PRODUCE COMPANY,

Plaintiff,

VS.

THOMAS JERKINS, JR.,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

INTERROGATORIES TO BE PROPOUNDED TO THE PLAINTIFF
IN THE ABOVE ENTITLED CAUSE UNDER AUTHORITY OF
SECTION 477, TITLE 7 OF THE 1940 CODE OF ALABAMA.

1. Attach to your answers to these interrogatories
an itemized statement of the account on which this suit is brought.

STATE OF ALABAMA

BALDWIN COUNTY

J. B. Blackburn
Atty. for Defendant

Before me, the undersigned authority within and
for said County in said State, personally appeared J. B. Blackburn,
who, after being by me first duly and legally sworn, deposes and says:
That he is attorney for the Defendant in the above entitled cause
and that the answers to the foregoing interrogatories, if well and
truly made, will be material testimony for the Defendant in the
above entitled cause.

J. B. Blackburn

Sworn to and subscribed before me
on this the 18th day of March, 1942.

Ora S. Nelson

Notary Public, Baldwin County, Alabama.

3/19/42 ✓

We hereby accept service of above

Beck & Sons
Huntsville

RECORDED

732

INTERROGATORIES TO BE PROPOUNDED
TO THE PLAINTIFF UNDER AUTHORITY
OF SECTION 477 TITLE 7 OF THE
1940 CODE OF ALABAMA.

J. C. GRIMES, Operating and doing
business as LOXLEY PRODUCE COM-
PANY,

Plaintiff,

VS.

THOMAS JERKINS, JR.,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

Filed 3-18-42
R. D. Burch
Clerk

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