

674

R. A. ~~EALES~~,

Plaintiff,

-VS-

FRED GABLE, WILLIAM PRITCHETT,
CHARLES KUTTER AND GLENN TOWNES,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

Come the Defendants in the above styled cause and
demur to the Complaint filed in said cause and to each and
every count thereof separately and severally, and as grounds
therefor say:

FIRST:

Said Complaint does not state a cause of action.

SECOND:

Said Complaint is vague and indefinite.

THIRD:

That Count 1 of said Complaint fails to state when
the Defendants are supposed to have taken the property therein
referred to.

Hyland & Pearson
Attorneys for Defendants.

Defendants demand a trial of this
cause by a jury.

Hyland & Pearson
Attorneys for Defendants.

DEMURRER.

R. A. EADES,,

Plaintiff,

-VS-

FRED GABLE, WILLIAM PRITCHETT,
CHARLES HUSTON AND GLENN
MCOWNE,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

FILED 18th DAY OF JULY, 1941.

R. S. Duck
CLERK.

STATE OF ALABAMA)
COUNTY OF BALDWIN)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. D. Middleton 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 State Bank of Alberta, a Corporation.

WITNESS my hand this 11th day of June, 1941.

R. S. Ditch
Clerk

STATE BANK OF ALBERTA,
a Corporation,
Plaintiff,

VS

J. D. MIDDLETON,
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

1. The Plaintiff claims of the Defendant Three Hundred (\$300.00) Dollars, due by promissory note made by him on the 12th day of July, 1939, and payable ninety days after date, with interest thereon at 8% per annum, from February 22nd, 1940.

The Plaintiff alleges that in and by said note the Defendant waived all rights of exemption under the Constitution and laws of the State of Alabama, and agreed to pay all costs of collecting or securing or attempting to collect or secure said note, including a reasonable attorney's fee.

The Plaintiff claims of the Defendant the further sum of Seventy Five Dollars (\$75.00), as a reasonable Attorney's fee.

ORVIS M. BROWN,

BY: Orvis M. Brown

674 Civil

STATE BANK OF ALBERTA

a corporation

RECORDED

VS.

JOHN D. MIDDLETON

BILL OF COMPLAINT

Filed June 20, 1941
R.S. Auch, Clerk

ORVIS H. BROWN,
ATTORNEY
ROBERTSDALE, ALABAMA

Received in Sheriff's Office
this 20 day of June, 1941
W. R. STUART, Sheriff

Executed this
the 27th day of
June 1941 by serving
a copy of the within
Bill of Complaint
on John D. Middleton

W.R. Stuart
Sheriff

W.R. Duckworth
J.S.

L.C.

STATE BANK OF ELBERTA, a
Corporation,

PLAINTIFF.

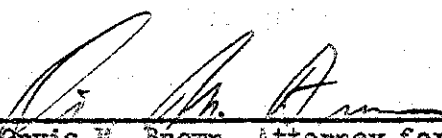
Vs.

J. D. MIDDLETON,

DEFENDANT.

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

Comes the Plaintiff for the above entitled cause and files this, his Motion for a Judgment by Default, against the said Defendant, service having been perfected more than thirty days ago on the said Defendant and he having neglected to plead, answer or demur to said Complaint in the time prescribed by law, hence this Motion for a Judgment by Default.


Orvis M. Brown, Attorney for Defendant

Plaintiff

Cms

6/11/41
11/11/41
11/11/41

Filed in 241941
R. S. D. C.
Cms

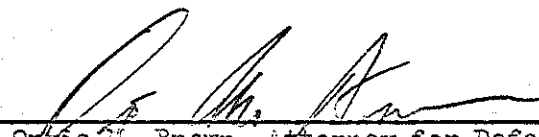
STATE BANK OF ELBERTA, a
Corporation,
PLAINTIFF.

Vs.

J. D. MIDDLETON,
DEFENDANT.

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

Comes the Plaintiff for the above entitled cause and
files this, his Motion for a Judgment by Default, against the said
Defendant, service having been perfected more than thirty days ago on
the said Defendant and he having neglected to plead, answer or demur
to said Complaint in the time prescribed by law, hence this Motion for
a Judgment by Default.


Orvis M. Brown, Attorney for Defendant

Plaintiff

Circled

129

Filed Dec 24 1941
Osdwick
Chief -