

MRS. P. J. DOYLE,

PLAINTIFF

VS

JOE BERGA, JR.

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

And now comes the Defendant, and for answer to the Plaintiff's Complaint, and to each count thereof, separately and severally, says:

1.

The facts alleged therein are untrue.

2.

The account sued on was paid in full before the commencement of this suit.

3.

That the amount sued for was the purchase price of a 1936 model La Salle automobile, which was warranted by the Plaintiff to be in good mechanical condition; that soon after the purchase of the said automobile the Defendant learned that the automobile was not as represented, and returned it to, and it was accepted by, the Plaintiff.

Berga & Hare

The Defendant demands a trial by Jury.

Berga & Hare

The State Of Alabama,

No. 818.

CIRCUIT COURT

County.

Nov.

Term, 1943

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

You are Hereby Commanded, That of the goods and chattels, lands and tenements of

Mrs P. J Doyle.

Defendant,

you cause to be made the sum of

DOLLARS,

which

Vs.

Plaintiff,

recovered of

on the

day of

Joe Berga Jr., 19

, by the Judgment of our Circuit Court held for the County of

, besides the sum of

Dollars

costs of suit, and have the same to render to the said

, and make return of this Writ and

the execution thereof, according to law.

Interest from

, 19

, to

, 19

Witness, my hand this

day of

, 19

, Clerk.

CLERK'S FEES	Amount	SHERIFF'S FEES	Amount
Issuing Summons and Complaint.....	\$1.25	Serving and Returning..... Summons.....	\$1.50
Issuing copies of same.....	.30	Serving and Returning..... Writs.....	1.30
Issuing Branch Summons & Complaint.....	1.25	Serving & Returning..... Subpoenas for... Wit.....	.65
Issuing copies of same.....	.30	Levying..... Attachment.....	3.00
Entering..... Sheriff's Return or copy of above.....	.20	Entering and Returning..... Attachment.....	.25
Docketing Cause.....	.25	Summoning and Returning..... Garnishee.....	1.50
Entering..... Appearances.....	.20	Serving & Returning..... Sci. Fas..... Notices.....	1.50
Filing..... Pleas..... Demurrers.....	.10	Impaneling Jury.....	.75
..... Affidavits, Certified.....	.25	Collecting Cost, Execution.....	1.50
..... Commissions to take Depositions.....	.75	Taking and Aproving..... Replevin Bonds.....	1.00
..... copies of Innterrogatories.....		 Claim Bonds.....	1.00
..... Notices of Filing Interrogatories.....	.50	 Garnishment Bonds.....	.75
Filing..... Packages of Depositions.....	.10	 Forthcoming Bonds.....	1.00
Inclosing..... Packages of Depositions.....	.10	 Bail Bonds.....	1.00
..... Orders in Court.....	.30	 Detinue Bond.....	1.00
..... Continuances.....	.10	Writ of Possession.....	5.00
Issuing..... Subpoenas for..... Witnesses.....	.30	Making Deed.....	5.00
Trial and Incidents.....	.75	Collecting Money on Execution.....	
Entering..... Judgment.....	.30	Writ of Restriction.....	2.00
Issuing Execution.....	.50	Sheriff's Commissions.....	
Entering..... Sheriff's Return of Execution.....	.20	Sheriff's Deed.....	
Issuing..... Certiorari..... Sci. Fas.....	.75	Seizing Personal Property in Detinue.....	3.00
Filing..... Certiorari, etc.....	.15	Former Sheriff's Fees.....	
Issuing..... Notices.....	.75	TOTAL SHERIFF'S FEES.....	1 50
Issuing..... copies of same.....	.50	WAIVER..... NO WAIVER.....	
Taking..... Bonds.....	.75	Recapitulation.....	
Filing..... Bonds.....	.10	Judgment for..... for.....	
Issuing... Attachment Writ.... & taking Bond.....	1.00	Interest from.....	
Filing..... Attachments.....	.10	Damages.....	
..... Summons of Garnishee.....	.50	Clerk's Fees.....	5 15.
Swearing and Ent..... Answer of Garnishee.....		Sheriff's Fees.....	1 50
Complete Record, 15c per 100 words.....	2 25	Justice of Peace Fees.....	
Transcript to Supreme Court.....		Witness Fees in Justice of Peace Court.....	
Certificate of Appeal to Supreme Court.....	.75	Constable's Fees.....	
..... Notices of Appeal.....	.75	Commissioner's Fees.....	
..... Appeal Bond.....	.75	Commissioner's Residence.....	
Certificate of Judgment.....	.50	Printer's Fees.....	
..... Witness Certificates.....	.25	Garnishee's Fees.....	
		Witness Fees in Circuit Court.....	
		Former Clerk's Fees.....	
		Trial Tax.....	3 00.
TOTAL CLERK'S FEES.....	5 15	TOTAL FEES.....	9 65

STATE OF ALABAMA,
BALDWIN COUNTY.

) IN THE CIRCUIT COURT
)
) IN EQUITY.

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:-

You are hereby commanded to summon Joe Berga, 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 same, then and there to answer the Complaint of Mrs.
P. J. Doyle.

Witness my hand this 31st day of June, 1943.

R. S. Welch
Clerk.

MRS. P. J. DOYLE,	I	
	-	IN THE CIRCUIT COURT OF
Plaintiff,	I	
	-	BALDWIN COUNTY,
- vs -	I	
	-	ALABAMA.
JOE BERGA, JR.,	I	
	-	AT LAW.
Defendant.	I	

O N E

The Plaintiff claims of the Defendant, the sum of Three Hundred (\$300.00) Dollars due from him by account on or about the 30th day of January 1943, which sum of money, together with interest thereon, is due and unpaid.

T W O

The Plaintiff claims of the Defendant, the sum of Three Hundred (\$300.00) Dollars for an automobile sold by the Plaintiff to the Defendant on or about January 30th. 1943, which said amount, with interest thereon, is due and unpaid.

T H R E E

The Plaintiff claims of the Defendant, the sum of Three Hundred (\$300.00) Dollars, for that on or about January 30th. 1943, the Plaintiff sold to the Defendant, an automobile for the sum of Three Hundred (\$300.00) Dollars, at the same time delivering the said automobile to the said Defendant, for which the Defendant then and there agreed in writing to pay in cash within the next few days; and Plaintiff further avers that she made demand by her agents upon the Defendant for the payment of said money, several times, and the Defendant refused

and failed to pay same, stating in writing that he
didn't have the money with which to pay same, never at
any time denying the indebtedness.

Mybaud & Reson

Armons Gordon
ATTORNEYS FOR PLAINTIFF.

Received in 2000
this 24 day of May, 1943
W. R. STUART, Sheriff

Executed 6-5 1943
by serving copy of within Summons and
Complaint on

Joe Berge Jr.

W. R. Stuart

Sherriff & Constable

818

RECORDED
818
COMPLAINT.

MRS. P. J. DOYLE,
Plaintiff,

VS.

JOE BERGA, JR.,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

FILED MAY 31, 1943.

Rodger
Clerk.

LAW OFFICES
HYBART & CHASON
Bay Minette, Alabama