

1026

H. L. GOODWIN

PLAINTIFF

VS

J. H. SHIBLEY

DEFENDANT

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

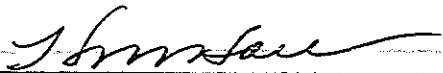
Now comes the Defendant and for answer to the Plaintiff's complaint and each count thereof separately and severally says:

1.

The facts are untrue.

2.

The Plaintiff ought not to recover of the Defendant because at the time the suit was filed the Plaintiff was indebted to the Defendant in the sum of SIX HUNDRED (\$600.00) DOLLARS, by account on, to-wit, September 1, 1946, which the Defendant offers to off set against the claim of the Plaintiff and claims judgment for the excess.


Attorney for the Defendant

1024

H. L. GOODWIN

PLAINTIFF

VS

J. H. SHIBLEY

DEFENDANT

ANSWER

FILED
MAR 3 1947
ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, {

BALDWIN COUNTY

No. _____

CIRCUIT COURT BALDWIN COUNTY

_____ TERM, 194_____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. H. SHIBLEY

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against_____

J. H. SHIBLEY

_____, Defendant_____

by H. L. GOODWIN

_____, Plaintiff_____

Witness my hand this 10 day of Feb 1947

Alice J. Leach Clerk.

No. 1026 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

H. L. GOODWIN

Plaintiffs

vs.

J. H. SHIBLEY

Defendants

SUMMONS AND COMPLAINT

Filed 2-10 1942

Wice J. Muck Clerk

RICKARBY & RICKARBY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

194

Sheriff

I have executed this summons

this

194

by leaving a copy with

Sheriff

Deputy Sheriff

H. L. GOODWIN,
Plaintiff

vs.

J. H. SHIBLEY,
Defendant

IN THE CIRCUIT COURT

OF

BALDWIN COUNTY, ALABAMA

AT LAW.

COMPLAINT

COUNT 1.


The Plaintiff claims of the Defendant five hundred and eighty four dollars, (\$584.00) due from him by account on, to wit, the 26th day of August, 1946, which sum of money, with interest thereof, is still unpaid.

COUNT 2.

The Plaintiff further claims of the Defendant five hundred and eighty four (\$584.00) dollars, due from him for work and labot done by the Plaintiff for the Defendant from, to wit, the 11th day of April, 1946, to the 26th day of August, 1946, at his request, which sum of money, together with the interest thereon, is still unpaid.


ATTORNEYS FOR PLAINTIFF

The account sued on is evidenced by an itemized and verified statement filed herewith.


ATTORNEYS FOR PLAINTIFF

1026

Hope

1656

Received in Office

2-11-47

Taylor Wilkins
Sheriff

Executed by serving
copy of the within
summons & complaint
on J. H. Shibley
Feb. 18, 1947

Taylor Wilkins Sheriff
H. F. Hall Deputy Sheriff

H. L. GOODWIN,
Plaintiff

VS.

J. H. SHIBLEY
Defendant

RICKAREY & RICKAREY
ATTORNEYS FOR
PLAINTIFF

Filed

2-10-47

*Oliver J. Smith
Clerk*

STATEMENT

J. H. SHIBLEY

IN ACCOUNT WITH

MRS. H. L. GOODWIN

SALARY DUE 1946

From April 11, to and including August 26th
@ \$20.00 per week \$388.00

STATE OF ALABAMA

COUNTY OF MOBILE

Before me, the undersigned authority in and for
said State and County, personally appeared Mrs. H. L. Goodwin
who being by me first duly sworn deposes and says that the
above statement of her account against J. H. Shibley of
Baldwin County in the State of Alabama is just, true and
correct; that there is now due on said account the sum of
\$388.00 after deducting all credits, setoffs or counterclaims.

Mrs. H. L. Goodwin
Mrs. H. L. Goodwin

Sworn to and subscribed before me
this 3rd day of January, 1947.

Marcell M. Cowan
Notary Public, Mobile County, Alabama

Filed 1-6-47
Alice J. Duck
clerk