

1168

BIRMINGHAM SLAG CO.,
Plaintiff

vs.

G. H. BONIE,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW

ANSWER

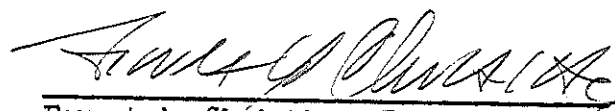
Comes the Defendant by his attorney and for answer pleads to each and every count, as follows:

1.

~~The Complaint fails to state a cause of action.~~

2.

That the allegations of the Complaint are untrue.


Forest A. Christian, Foley, Alabama
Attorney for Defendant

The Defendant demands trial by jury.



BIRMINGHAM SLAG CO.,
Plaintiff

vs.

G. H. BONIE,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW

*Filed 4-10-48
Alice J. Buck
Clerk*

BIRMINGHAM SLAG COMPANY,
A Corporation,

Plaintiff,

vs.

G. H. BONIE,

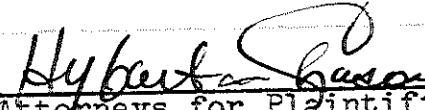
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

LAW SIDE.

Comes the Plaintiff in the above styled cause and demurs to paragraph one of the answer filed by the Defendant in said cause and as grounds for said demurrer says:-

1. That it states no defense to the Complaint.
2. That the allegation in paragraph one of the answer to the Complaint, "that it fails to state a cause of action" is no defense to the suit.


Attorneys for Plaintiff.

DEMURRER TO ANSWER

BIRMINGHAM SLAG COMPANY,
A Corporation,

Plaintiff,

vs.

G. H. BONIE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

LAW SIDE.

Filed this 9th day of
August, 1948.

Reice J. Smith
Clerk.

SUMMONS

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT
LAW SIDE.

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

You are hereby commanded to summon G. H. Bonie, 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 Birmingham Slag Company, a corporation.

Witness my hand this 29 day of March, 1948.

Alice J. Welch
Clerk.

COMPLAINT

BIRMINGHAM SLAG COMPANY,
A corporation,

Plaintiff,

vs.

G. H. BONIE,

Defendant,

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

COUNT I

The Plaintiff claims of the Defendant Three Hundred Forty Five and 88/100 (\$345.88) Dollars, together with interest thereon, due from him by account on, to-wit:- the 19th day of March, 1947, which sum of money, with interest thereon, is still unpaid.

COUNT II

The Plaintiff claims of the Defendant Three Hundred Forty Five and 88/100 (\$345.88) Dollars, together with interest thereon, due from him on account state between the Plaintiff and the Defendant on, to-wit:- the 19th day of March, 1947, which sum of money together with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant Three Hundred Forty Five and 88/100 (\$345.88) Dollars, together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit:- the 19th day of March, 1947, which sum of money with the interest thereon is still unpaid.

Hylant and Chason
Attorneys for Plaintiff.

Received in Sheriff's Office
this 29 day of March, 1948
TAYLOR WILKINS, Sheriff

Executed 4-10-48
By serving copy of the
Within Summons + Complaint
on G. H. Bonie

Taylor Wilkins Sheriff
H. F. Hall D. S.

No. 1168

BIRMINGHAM SLAG COMPANY,
A corporation,

Plaintiff,

vs.

G. H. BONIE,

Defendant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

SUMMONS AND COMPLAINT

Filed this 29 day of

March, 1948.

Alice J. Hybart
Clerk.

LAW OFFICES

HYBART & CHASON

BAY MINETTE, ALABAMA