

CARL L. BLOXHAM

Plaintiff

LAW

VS

CIRCUIT COURT OF

A. M. MARTIN

BALDWIN COUNTY, ALABAMA.

Defendant

FIRST: The Plaintiff claims of the Defendant the sum of TWO HUNDRED FIFTY DOLLARS as rent of the dwelling owned by the Plaintiff, and located at No. 315 Fels Avenue, town of Fairhope, Alabama, from February 2, 1944 to July 2, 1944.

SECOND: The Plaintiff claims of the Defendant the further sum of TWO HUNDRED FIFTY DOLLARS due from him by account on, towit, July 2, 1944.

THIRD: Plaintiff claims of the Defendant the further sum of TWO HUNDRED FIFTY DOLLARS due from him by stated account on, towit, July 7, 1944.

All of which sums of money with the interest thereon, are still due and unpaid.

The debt upon which this action is based is evidenced by itemized and verified account filed herewith.

Attorney for Plaintiff.

Elliott & Ring

CARL L. BLOXHAM
Plaintiff

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LAW

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

V

A. M. MARTIN
Defendant

FIRST: The Plaintiff claims of the Defendant the sum of TWO HUNDRED FIFTY DOLLARS as rent of the dwelling owned by the Plaintiff, and located at No. 315 Fels Avenue, Town of Fairhope, Alabama, from February 2, 1944 to July 3, 1944.

SECOND: The Plaintiff claims of the Defendant the further sum of TWO HUNDRED FIFTY DOLLARS due from him by account on, to-wit, July 2, 1944.

THIRD: Plaintiff claims of the Defendant the further sum of TWO HUNDRED FIFTY DOLLARS due from him by stated account on, to-wit, July 7, 1944.

All of which sums of money with the interest thereon, are still due and unpaid.

The debt upon which this action is based is evidenced by itemized and verified account filed herewith.

Attorney for Plaintiff.

CARL L. BLOXHAM

To rent of dwelling No. 315 Fels Ave;, Fairhope, Alabama, from Feb. 2, 1944 to July 2, 1944.

Five months @ \$50.00

\$250.00

STATE OF ALABAMA:

COUNTY OF BALDWIN:

Before me the undersigned notary, personally appeared this day CARL L. BLOXHAM, who being sworn says that the attached statement of indebtedness of A. M. MARTIN to him is full true and correct, and that the balance of TWO HUNDRED FIFTY DOLLARS shown as due is still unpaid.

Subscribed and sworn to before me this the 24th. day of

August, 1944

Rotary Public, Baldwin County, Ava.

Carl A Bloshan

To rent of dwelling No. SLE Rels Avo;, Fairhope, Alebama, from Yeb. 2, 1844 to July 2, 1944.

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August, 1844

Mottay Rashto, Establis County;

PLAINTIFF,
VS.
A. M. MARTIN,
DEFENDANT.

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

Comes the Defendant in the above styled cause and demurs to Count one of Complainant's Complaint and as grounds of demur, says:

- A. It is not alleged in said count that the Defendant agreed to pay the rent therein alleged.
- B. It is not alleged in said count that the amount claimed is a reasonable rental on the said premises.
- C. It is not alleged in said count that the Defendant rented the said premises from the Plaintiff.
- D. It is not alleged in the said count that the Defendant has not paid the rentals due on the said premises.
- E. It is not alleged in the said count that the rentals claimed were authorized to be charged by law, for the said premises.

Beebe & Hall

By McBuly
Attorneys for Defendant

Defandant demands a trial by jury of this cause.

Beebe & Hall

Be M. C/Dube

Attorneys for defendant

Applicant and sprigning example in productions

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COORDED

THE STATE OF ALABAMA, \ No	CIRCUIT COURT	BALDWIN COUNTY
	SEPTEMBER	TERM, 194 4
TO ANY SHERIFF OF THE STATE OF ALABAMA	: :	
You are hereby commanded to summon		
A. M. MARTIN		
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to appear and plead, answer or demur, within thirty days from the Circuit Court of Baldwin County, State of Alabama, at I		
CARL L. BLOX	H A M,	, Defendant
by		Plaintiff
Witness my hand this 25th day of sag	est	194=•
		Clerk.

KECORDEN	
No. 885	
THE STATE OF ALABAMA	Defendant lives at
BALDWIN COUNTY	202 Conti St. Mobile ale
CIRCUIT COURT	RECEIVED IN OFFICE
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CARL L. BLOXHAM	W. N. Holcombe Sheriff
Plaintiffs vs.	I have executed this summons
	this Michman 12 1946
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A. M. MARTIN	A.m. Martin
Defendants	
SUMMONS AND COMPLAINT	
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Plaintiff's Aftorney	W.N. No Com Welheriff
Defendant's Attorney	11. M. Lale Deputy Sheriff
Moore Printing Co., Bay Minette, Ala.	
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THE STATE OF ALABAMA,	, l _{No.} 885	CIRCUIT COURT B	ALDWIN COUNTY
BALDWIN COUNTY		August	TERM, 194_4_
TO ANY SHERIFF OF THE STATE	OF ALABAMA	· •	•
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to appear and plead, answer or demur, with	nin thirty days fr	om the service hereof, to	the Complaint filed in
the Circuit Court of Baldwin County, State	of Alabama, at l	Bay Minette, against	<i>/</i> .
A.M. Martin			——, Defendant——
byCar	I Blo	- many paids	, Defendant
	J		Plaintiff
Witness my hand this 25th	day ofAn	Rhille	194.4
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No. 885 Page	Defendant lives at
THE STATE OF ALABAMA	202 Conti-SI-mabile, a
BALDWIN COUNTY	RECEIVED IN OFFICE
CIRCUIT COURT	RECEIVED IN OFFICE
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Filed August - 25th 1944	
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Elliott G. Rickerby	
TILIOU . TOKAPDY	
· Plaintiff's Attorney	W. M. Halcombe Sherif
Fiantin 8 Attorney	W. M. Malcombre. Sherif
Defendant's Attorney	LI. M. Jale Deputy Sherif
	and a second second
Moore Printing Co., Bay Minette, Ala.	

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