

PHIL BRADY, Individually and
doing business as PHIL BRADY
ELECTRIC COMPANY,

Plaintiff

VS.

ROBERT R. NAHRGANG,

Defendant

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY,
) ALABAMA

)

)

AT LAW.

NO. 1193

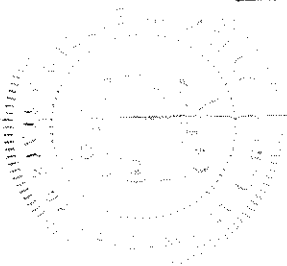
Comes the defendant in the above styled cause and,
for answer to the interrogatories heretofore propounded to
him by the plaintiff in this cause, doth say as follows:

1. Yes.
2. I am unable to recall with certainty whether I
received bills for this account, but I believe I did.
3. I have never heretofore protested the correctness
of the amount claimed by the plaintiff.
4. I do not recall having made any cash payments
against the amount claimed by the plaintiff.

Robert R. Nahrang
Plaintiff

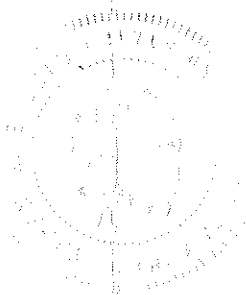
Subscribed and sworn to before me
on this 5th day of August,
1948.

Willie M. Kuey
Notary Public



REC'D

1183



filed 8-7-48
Weir J. Duck
Clerk

LAW OFFICES OF
VAN ANTWERP & RECTOR
354 St. Francis Street
MOBILE 13, ALABAMA

GARET VAN ANTWERP, III
H. HAYDEN RECTOR

Telephone 2-7526
Telephone 2-7527

7
February
1952

Honorable Telfair Mashburn
Judge of the Circuit Court
Baldwin County
Bay Minette, Alabama

Dear Telfair:

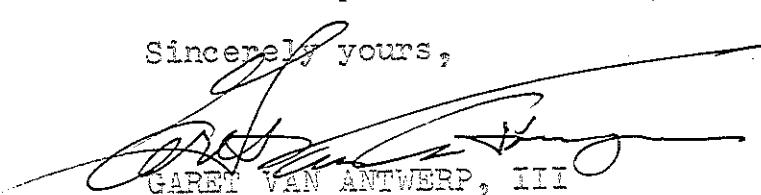
I wish to give notice hereby of my formal withdrawal from the
cases now pending on the docket of your Court entitled:
Nahrgang vs Bonie and Phil Brady vs Nahrgang. 1193

1019

When I was in Court Tuesday, I was somewhat surprised when
those cases were called as I thought they had been dismissed
long since.

With kind personal regards, I am,

Sincerely yours,



GARET VAN ANTWERP, III

GVA/jb

CC: Mr. R. R. Nahrgang

filed 2-24-52

LAW OFFICES OF
VAN ANTWERP & RECTOR

354 ST. FRANCIS STREET
MOBILE 13, ALABAMA

★ GARET VAN ANTWERP, III
H. HAYDEN RECTOR

TELEPHONES 2-7526
2-7527

30 June 1948

Mrs. Alice J. Duck
Clerk, Circuit Court
Bay Minette, Alabama

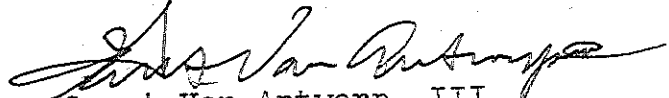
Re: Phil Brady, individually and
d/b/a Phil Brady Electric Co.
vs Robert R. Nahrgang
#1193

Dear Mrs. Duck:

We enclose the plea of the Defendant in the
above styled cause for filing. We shall greatly ap-
preciate your taking care of this matter for us.

Respectfully yours,

VAN ANTWERP & RECTOR


Garet Van Antwerp, III

Encl:

GVA/bk

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No.

..... TERM, 194.....

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You Are Hereby Commanded to Summon ROBERT R. NAHRGANG

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

ROBERT R. NAHRGANG

....., Defendant.....

by PHIL BRADY, Individually and Doing Business as

PHIL BRADY ELECTRIC COMPANY

....., Plaintiff.....

Witness my hand this 29th day of May 1948..

Wesley J. Duck, Clerk.

No. _____ Page _____

THE STATE of ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

PHIL BRADY Individually and
Doing Business as PHIL BRADY
ELECTRIC COMPANY Plaintiffs
vs.

ROBERT R. NAHRGANG

Defendants

SUMMONS and COMPLAINT

Filed _____, 194_____

Clerk

Rickarby & Rickarby

Plaintiff's Attorney

Defendant's Attorney

Moore Printing Co.

Defendant lives at

Fairhope, Alabama

RECEIVED IN OFFICE

_____, 194_____

_____, Sheriff

I have executed this summons

this _____, 194_____
by leaving a copy with

Sheriff

Deputy Sheriff

PHIL BRADY, Individually and
Doing Business as
PHIL BRADY ELECTRIC COMPANY
Plaintiff

L A W

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Vs

ROBERT R. NAHRGANG
Defendant

The Plaintiff claims of the Defendant ONE HUNDRED EIGHTY
SIX and 76/100 DOLLARS (\$186.76) due from him on accounts stated
between Plaintiff and Defendant on to-wit the 1st day of November
1944, which sum of money with interest thereon is still due and
unpaid.


Attorney for Plaintiff

11-3 RECORDED

PHIL BRADY, Individually
and Doing Business as
Phil Brady Electric Co.
Plaintiff

vs.

ROBERT R. NAHRGANG Jr
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

SUMMONS AND COMPLAINT

Filed
5-29-48
Arling. Dicks
clerk

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

Executed June 5th 1948
by serving copy of within Summons and
Complaint on

Robert R. Nahrangan

Jaybe Wilkins Sheriff
B. R. Willis Deputy Sheriff

PHIL BRADY, Individually and
d/b/a PHIL BRADY ELECTRIC CO.,
Plaintiff.

VS.

ROBERT R. NAHRGANG,

Defendant

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
)

) AT LAW.

NO 1193

Comes the Defendant in the above entitled cause and,
as a defense to the action of the Plaintiff, says that, at the
time said action was commenced, the Plaintiff was indebted to
the Defendant in the sum of TWO HUNDRED NINETEEN and TWENTY/00
DOLLARS (\$219.20) on account stated between the Defendant and
the Plaintiff on, to-wit, September 1, 1943, which sum of money
with interest thereon is still due and unpaid, and which Defendant
hereby offers to set off against the demand of the Plaintiff,
and Defendant claims judgment for the excess.

Van Antwerp & Rector
Attorneys for Defendant

PHIL BRADY, Individually and
Doing Business as
PHIL BRADY ELECTRIC COMPANY
Plaintiff

L A W
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

vs

ROBERT R. NAHRGANG
Defendant

Comes the Plaintiff in the above styled cause desiring
the testimony of the Defendant and files herewith Interrogatories
propounded to the Defendant.

INTERROGATORY #1; Did you purchase the following equipment
from the Plaintiff to-wit:

2---2 1/2 x 1 1/4 Nipples
Sept. 11 '43 Gas Stove
Nov. 16 '43 Gas Space Heater
Oct 7 '44 2500 Ft. Wire

INTERROGATORY #2: Did you receive bills for the same?

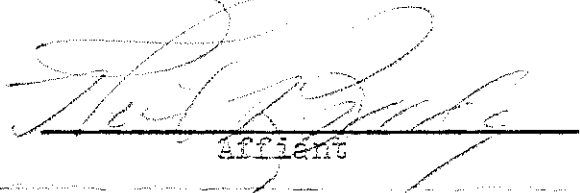
INTERROGATORY #3: Did you ever protest to Mr. Brady that
this bill was incorrect prior to 1947?

INTERROGATORY #4: Did you pay for said goods, if so please
give dates and when said payments were made.

STATE OF ALABAMA:

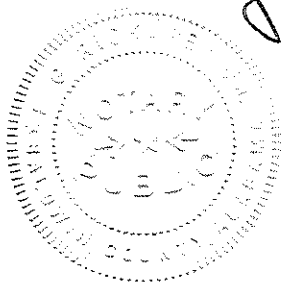
COUNTY OF BALDWIN:

Before me the undersigned Notary Public personally appeared
Phil Brady, who being first duly sworn deposes and says that the
answer to the foregoing Interrogatories if well and truly made will
be material testimony for him in this cause.


Affiant

Subscribed and sworn to before me on this the 18 day of
1948.


Notary Public, Baldwin County, Alabama



Executed June 5 1948
by serving copy of within Summons and
Complaint on

Robert R Nairgang Jr.

Taylor Wilkins Sheriff
R R Wilkins Deputy Sheriff

1193 RECORDED

PHIL BRADY, Individually
and Doing Business as
PHIL BRADY ELECTRIC CO.
Plaintiff

vs.

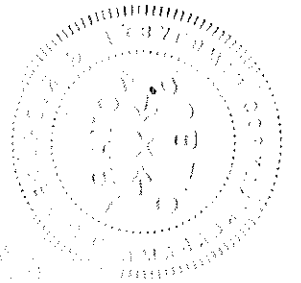
ROBERT R. NAIRGANG
Defendant

IN THE CIRCUIT COURT
OF BALDWIN COUNTY
ALABAMA

INTERROGATORIES

PROPOUNDED TO DEFENDANT

Filed
5-27-48
A. J. Duck
Clerk



LAW OFFICES OF
VAN ANTWERP & RECTOR
354 ST. FRANCIS STREET
MOBILE 13, ALABAMA

1193

★ GARET VAN ANTWERP, III
H. HAYDEN RECTOR

TELEPHONES 2-7526
2-7527

6 August 1948

Messrs. Rickarby & Rickarby
Attorneys at Law
Fairhope, Alabama

Re: Brady vs. Wahrgang

Attn: Mr. E. G. Rickarby, Jr.

Dear Sir:

We enclose herewith a copy of Defendant's answers to the interrogatories propounded to him by the Plaintiff. In our last telephone conversation you agreed to accept service of these answers by mail and to waive formal service in order to avoid additional court costs.

Very truly yours,

VAN ANTWERP & RECTOR

GVA
Garet Van Antwerp, III

Encl:

cc: Mrs. Alice J. Duck
Clerk, Circuit Court
Bay Minette, Alabama

GVA/bk

LAW OFFICES OF
VAN ANTWERP & RECTOR

354 ST. FRANCIS STREET
MOBILE 13, ALABAMA

★ GARET VAN ANTWERP, III
H. HAYDEN RECTOR

TELEPHONES 2-7526
2-7527

6 August 1948

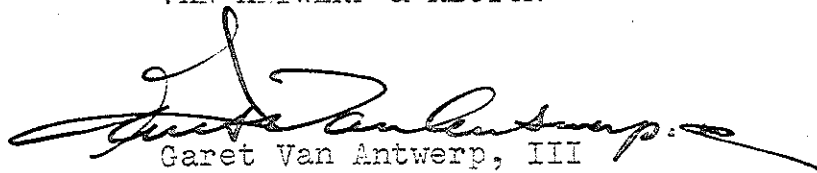
Mrs. Alice J. Duck
Clerk, Circuit Court
Courthouse
Bay Minette, Alabama

Dear Mrs. Dick:

We enclose for filing Defendant's answers to the interrogatories propounded to him by the Plaintiff. We also enclose copy of letter of even date addressed to Messrs. Rickarby & Rickarby, which letter is self-explanatory. Formal service will not be necessary.

Respectfully yours,

VAN ANTWERP & RECTOR



Garet Van Antwerp, III

Encl:

GVA/bk