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STATE OF ALABAMA, 0
COUNTY OF BALDWIN. 0

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETING:

You are hereby commanded to summon T. M. MOSS, Doing Business as Gordon Motor Company, Foley, Alabama, 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 the same, then and there to answer the complaint of C. M. BRANTLEY.

Witness my hand, this 10th day of November, 1948.

CLERK. A DIECK

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C. M. BRANTLEY,

Plaintiff,

rialitri,

VS.

T. M. MOSS, Doing Business as Gordon Motor Company,

Defendant.

NO. \_\_\_\_\_

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

COMPLAINT.

## COUNT ONE.

The Plaintiff claims of the Defendant Three Hundred and Fifty (\$350.00) Dollars, for money on the 17th day of April, 1948, received by the defendant to the use of the plaintiff, which sum of money, with the interest thereon, is till unpaid.

## COUNT TWO.

The Plaintiff claims of the defendant Three Hundred and Fifty (\$350.00) Dollars, due from him on account stated between the plaintiff and defendant on, to-wit: the 24th day of September, 1948.

## COUNTY THREE.

The Plaintiff claims of the Defendant Three Hundred and Fifty (\$350.00) Dollars, damages for that on the 17th day of April,

,

1948, for the purpose of inducing Plaintiff to purchase from him a used, 1940, Chevrolet Coupe, Motor No. 3218567, he represented to the plaintiff that he was the owner of the said car and had a good right to sell and convey same.

The Plaintiff was thereby induced to purchase said automobile from the Defendant for the said sum of Three Hundred and Fifty (\$350.00) Dollars.

That said representations were false and then known to be or ought to have been known by the defendant to be false; that the true owner of said car took the car from the Plaintiff on, to-wit: August 1, 1948; and that the defendant, although often requested to do so, has refused to repay to the plaintiff the \$350.00, as aforesaid.

Plaintiff also claims interest on the aforesaid sum from August 1, 1948.

Jelfair A. Mashberry fr. Attorfrey for Flaintiff.

NO. 1266 IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

\*\*\*\*\*

AT LAW.

C. M. BRANTLEY,
Plaintiff,

VS.

T. M. MOSS, DOING BUSINESS
AS GORDON MOTOR COMPANY,

Defendant.

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. SUMMONS AND COMPLAINT.

Filed 11-10-48 acrich

TELFAIR J. MASHBURN, Jr.

LAWYER

Bay Minette, Alabama

Received in Sheriff's Chice this 10 day of 1907, 1948
TAYLOR WILKINS, Sheriff

Executed 1-16 1948
by serving copy of within Summons and Complaint on

TM. Moos

Jaylor Wilhins Shoriff
By Salleigh Steadbooks: cheriff

C. M. BRANTLEY,

Plaintiff,

-vs-

T. M. MOSS, Doing Business as Gordon Motor Company,

Defendant.

NO. 1266
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Comes the Defendant in the above entitled cause and demurs to the complaint and separately and severally to each count thereof and for grounds of demurrer assigns separately and severally the following:-

- 1. That said counts do not state a cause of action.
- 2. That there is a misjoinder of counts.

Defendant demands a trial by jury.

Attorney for Defendant

C. M. BRANTLEY,

Plaintiff,

-VS-

T. M. MOSS, doing business as Gordon Motor Company,

Defendant.

NO. 1 2 6 6
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

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CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

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