

FINLEY OWEN

PLAINTIFF

VS.

A. S. BERTOIA, ET AL.

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

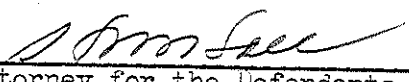
Now come the Defendants separately and severally and for answer to the Plaintiff's complaint, and to each count thereof separately and severally say:

1.


That the facts therein alleged are untrue.

2.

That they are not indebted to the Plaintiff.


Attorney for the Defendants

The Defendants demand a trial by jury.


Attorney for the Defendants

7201397

FINLEY OWEN

PLAINTIFF

VS.

A. S. BERTOLLA, ET AL.

DEFENDANTS

Filed 9-29-49

Wm. J. Ruck
Clerk

STATE OF ALABAMA }
BALDWIN COUNTY. }

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon A.S. BERTOLLA, A.F. BERTOLLA, J.P. BERTOLLA, and R.F. BERTOLLA, individually and as partners doing business in a partnership known as A. BERTOLLA AND SONS, Defendants, 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 FINLEY OWEN, Plaintiff.

Witness my hand this 25th day of August, 1949.

Heinz F. Luck CLERK.

COMPLAINT

FINLEY OWEN
PLAINTIFF

VS

A.S. BERTOLLA, A.F. BERTOLLA,
J.P. BERTOLLA, & R.F. BERTOLLA,
A PARTNERSHIP, d/b/a A. BERTOLLA & SONS
DEFENDANTS.

COUNT 1. The Plaintiff claims of the Defendants, FOUR HUNDRED TWELVE and 50/100 DOLLARS (\$412.50), due from Defendants by account on the 15th day of March, 1947, which sum of money with interest thereon is due and unpaid, and is the property of the Plaintiff.

COUNT 2. And the Plaintiff further claims of the Defendants FOUR HUNDRED TWELVE and 50/100 DOLLARS (\$412.50), due for work and labor done by the plaintiff for the Defendants at their request, for to-wit: the month of February and fifteen days in March, 1947.

Which several sums of money, with interest thereon, are now due and unpaid.

C. L. Thompson
ATTORNEY FOR PLAINTIFF

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon _____

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 _____

_____, Defendant.---

by _____

_____, Plaintiff.---

Witness my hand this _____ day of _____ 19_____.

_____, Clerk

No. 1397

Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Finley Owens

Plaintiffs

vs.

A.S. Bertolla A.F. Bertolla J.P.
Bertolla & R.F. Bertolla &
Partnership d/b/a A. Bertolla Sons

Defendants

SUMMONS and COMPLAINT

Filed 6-25, 1949

Reich Freick Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

August 25, 1949

Taylor Wilkins, Sheriff

I have executed this summons

this 9-8, 1949
by leaving a copy with

A.S. Bertolla 8-26-49

A.F. Bertolla 9-8-49

J.P. Bertolla 9-8-49

R.F. Bertolla 8-27-49

Taylor Wilkins Sheriff

Edleigh Steadler Deputy Sheriff