

IN THE CIRCUIT COURT . . LAW SIDE

You are hereby commanded to summons A. M. Fell to appear within thirty (30) 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 Roy A. Beesley.

WITNESS my hand this 19th day of April, 1950.

David J. Roberts
Clerk

[illegible]

ROY A. BEESLEY,

IN THE CIRCUIT COURT OF

-VS-

BALDWIN COUNTY, ALABAMA

A. M. FELL,

LAW SIDE

Defendant.

The plaintiff claims of the defendant One Hundred Eighty-one & 04/100 Dollars (\$181.04) due from him for merchandise, goods and chattels sold by the plaintiff to the defendant and for work and labor done for the defendant by the plaintiff on the 12th day of August, 1949, and at his request, which sum of money, with the interest thereon, is still unpaid.

The plaintiff claims of the defendant One Hundred Eighty-one & 04/100 Dollars (\$181.04) due from him by account on the 1st day of September, 1949, which sum of money, with the interest thereon, is still unpaid.


Attorney for Plaintiff

Received in Sheriff's Office
this 14 day of April 1950
TAYLOR WILKINS, Sheriff

5-9-50
RECORDED

701484

SUMMONS AND COMPLAINT

ROY A. BEESLEY,
Plaintiff,

- v s -

A. M. FELL,
Defendant.

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

FILED

APR 19 1950

ALICE L. DUCK, Clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

Executed May-9-1950
By Serving copy on

A. M. Fell

Sheriff
Taylor Wilkins

By
Edleigh Statham

ROY A. BEESLEY,

Plaintiff,

vs.

A. M. FELL,

Defendant, \$

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes the defendant in the above styled cause and demurs to the complaint and for grounds assigns separately and severally the following;

One.

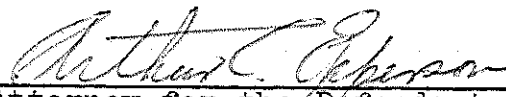
That the plaintiff has set out and joined separate and independent actions in the same count.

Two

That the defendant can not ascertain the ground upon which the plaintiff depends for recovery and therefore is not informed of the matter to be put in issue.

Three

That the complaint does not state a cause of action.


Attorney for the Defendant

No 1484

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW

ROY A. BEESLEY

Plaintiff,

Vs.

A. M. FELL

Defendant

DEMURRER TO THE COMPLAINT

FILED
JUN 10 1950
ALICE J. DUCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

FILED
JUN 10 1950
ALICE J. DUCK, Clerk

198.40

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Cecil G. Chason, a Notary Public in and for said County in said State, personally appeared Roy A. Beesley, who is known to me, and who after being by me first duly and legally sworn, deposes and says under oath as follows:

That his name is Roy A. Beesley; that he is the owner of the account due by A. M. Fell; that this account became due on the 12th day of August, 1949 and became due as a result of plumbing work done and materials furnished by affiant for and at the request of A. M. Fell; that the amount of \$181.04 with interest thereon from the 12th day of August, 1949 is still due and unpaid, after allowing all just credits and offsets.

Roy A. Beesley

Sworn to and subscribed before me,
a Notary Public, on this 27th day
of February, 1952.

Cecil G. Chason
Notary Public, Baldwin County
State of Alabama

