Clerk, Circuit Court, Baldwin County, Alabama.

·	(CII	RCUIT COURT		Term. 19
Baldwin County.			· proportion of the second	
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Mc Gowain Lyons Hardware &	Supplie Co			
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	Plaintiff	e de la companya de l		
	Vs.			
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Roy Beesley d/b/a Beesley	Plumbing C	O.e.:	·········	
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en er Maria de La Harris de la Maria d La maria de la	Defendant			Contract to the contract of th
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I, Alice J. Duck		, Clerk	of the Circuit Cour	t of Baldwin County
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and the second s	· · · · · · · · · · · · · · · · · · ·			
Alabama, do hereby certify that on t	he 3rd c	lay of Oct	ober "	, 19.50
Judgment was rendered by said	Court in the	above stated	cause, wherein	
Alabama, do hereby certify that on to Judgment was rendered by said Mc Gowain Lyons Hardware	Court in the	above stated	cause, wherein	
Judgment was rendered by said Mc Gowain Lyons Hardware	Court in the & Supply Co	above stated	cause, wherein	
Judgment was rendered by said Mc Gowain Lyons Hardware	Court in the & Supply Co	above stated	cause, wherein	
Judgment was rendered by said Mc Gowain Lyons Hardware was Plaintiff and Roy Bee	Court in the & Supply Co	above stated Beesley	cause, wherein	
Judgment was rendered by said Mc Gowain Lyons Hardware was Plaintiff and Roy Bee	Court in the & Supply Co	above stated Beesley	cause, wherein	
Judgment was rendered by said Mc Gowain Lyons Hardware was Plaintiff and Roy Bee	Court in the & Supply Co	above stated Beesley F	cause, wherein	was Defendant, i
Judgment was rendered by said Mc Gowain Lyons Hardware was Plaintiff and Roy Bee	Court in the & Supply Co	above stated Beesley F	cause, wherein	was Defendant, i
Judgment was rendered by said Mc Gowain Lyons Hardware was Plaintiff and Roy Bee	Court in the & Supply Coesley d/b/a	above stated Beesley Fendant for th	cause, wherein	was Defendant, i
Mc Gowain Lyons Hardware was Plaintiff and Roy Bee avor of the said Plaintiff and agains	Court in the & Supply Coesley d/b/a	Beesley I	cause, wherein lumbing Co. e sum of	was Defendant, i
Mc Gowain Lyons Hardware was Plaintiff and Roy Bee	Court in the & Supply Coesley d/b/a	Beesley I	cause, wherein lumbing Co. e sum of	was Defendant, i
Mc Gowain Lyons Hardware Was Plaintiff and Roy Bee avor of the said Plaintiff and agains The thousand Three Hundred and for the sum of Fourteen and	Court in the & Supply Coesley d/b/ast the said Des Eighty Five	Beesley Fendant for the	cause, wherein lumbing Co. e sum of	was Defendant, i DOLLAR:
Mc Gowain Lyons Hardware was Plaintiff and Roy Bee avor of the said Plaintiff and agains	Court in the & Supply Coesley d/b/ast the said Des Eighty Five	Beesley Fendant for the	cause, wherein lumbing Co. e sum of	was Defendant, i DOLLAR:
Mc Gowain Lyons Hardware Was Plaintiff and Roy Bee avor of the said Plaintiff and agains The thousand Three Hundred and for the sum of Fourteen and the costs in said suit, and that	Court in the & Supply Coesley d/b/ast the said Des Eighty Five 175/100	above stated Beesley F fendant for th and No/100 (\$14.75)	cause, wherein Tumbing Co. e sum of	was Defendant, i
Judgment was rendered by said Mc Gowain Lyons Hardware vas Plaintiff and Roy Bee avor of the said Plaintiff and agains The thousand Three Hundred and for the sum of Fourteen and the costs in said suit, and that	Court in the & Supply Co esley d/b/a st the said De Eighty Five 1 75/100 Walter M.	above stated Beesley F fendant for th and No/100 (\$14.75) Cook	cause, wherein Tumbing Co. e sum of (\$1385.00)	was Defendant, i
Judgment was rendered by said Mc Gowain Lyons Hardware vas Plaintiff and Roy Bee avor of the said Plaintiff and agains The thousand Three Hundred and for the sum of Fourteen and the costs in said suit, and that	Court in the & Supply Co esley d/b/a st the said De Eighty Five 1 75/100 Walter M.	above stated Beesley F fendant for th and No/100 (\$14.75)	cause, wherein Tumbing Co. e sum of (\$1385.00)	was Defendant, i

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	Baldwin County.				· professional and a second)
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	Roy Beesley d/b/a Beesley	y Plumbir	g Co.			•	·.
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•	I, Alice J. Duck			, Clerk o	f the Circui	t Court of Ba	ndwin County,
	Mc Gowain Lyons Hardware	& Suppl	y Co.	1 .			
5.							
was	Plaintiff and Roy Be	esley d	/b/a Bec	sley Pl	umbing Co.		
			***************************************			wa	s Defendant, in
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f237/	or of the said Plaintiff and again	nst the said	d Defenda	at for the	sum of		
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	Dne thousand Three Hundred	l Eighty	Five and	No/100	(\$1385.0	0)	DOLLARS
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	costs in said suit, and that	Walter	M. Cook				
the	costs in said suit, and that	***************************************	***************************************	*************			₩
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• • •	Witness my hand this 4	day o	f	ctober	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	, 1	9. 50.
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•			, i C	lerk, Circ	cuif Court, B	aldwin Coun	ty, Alabama.

CERTIFICATE OF JUDGMENT

	Mc	Gowai	in Lyons Hardw	are & Supply
			Co.	
				, Plaintiff
				., Plantini
			Vs.	
	Ro	y Bees	sley D/b/a/	
			Beesley Plumb	ing Co.
	*1 * *2 * * * . * * * .			Defendant
••••				Defendant

COLLINS AND GALLOWAY

FRED G. COLLINS THOMAS M. GALLOWAY

PHONE 3-8921

224 GRAYSTONE BUILDING

May 10, 1950

Clerk of the Circuit Court Baldwin County Court House Bay Minette, Alabama.

Dear Sir:

Enclosed please find an original complaint and an amended complaint which I wish to file in your Court.

Since it will be necessary for me to travel to Bay Minette to try these cases, and since they are both against the same defendant, I would consider it a great favor if they could be set down for trial on the same day.

Yours very truly,

Fred G. Collins

CARLTON D. EDEN, doing business) as the OCEANIC SUPPLY COMPANY,			(
	- ()	(IN THE CIR	CUIT	CO	URT	0	F
	Plaintiff,)	(BALDWIN CO	, YTNUC	Al	LAB	AM	A
-VS-	Ÿ)	(AT LAW	NO.	1	4	9	5
ROY BEESLEY,	Defendant)	(
	Defendant.)	(

Comes the defendant in the above entitled cause and demurs to the complaint originally filed in said cause and the ammended complaint filed thereto and for grounds of demurrer assigns separately and severally the following:-

1. Said complaint states no cause of action against the defendant.

Attorney for Defendant

Defendant demands a trial

by jury:

Attorney for Defendant

RECORDED Juny

DEMURRERS TO BILL OF COMPLAINT

CARLTON D. EDEN, doing business as the OCEANIC SUPPLY COMPANY,

Plaintiff,

-VS-

ROY BEESLEY,

Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW NO. 1495

FILED

JUN 10 1950 N FOLEY, ALABAMA

STATE OF ALABAMA BALDWIN COUNTY

CARLTON D. EDEN, doing business as the OCEANIC SUPPLY COMPANY PLAINTIFF

VS.

ROY BEESLEY

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.
Case No.

AMENDED COMPLAINT

Now comes the plaintiff in the above styled cause, and with leave of the Court amends his complaint by adding thereto the following paragraphs:

Plaintiff claims benefit of waivers of exemption made in said note by said defendant.

Plaintiff claims also a reasonable attorney's fee, averring that ONE HUNDRED and TWENTY FIVE DOLLARS (\$125.00) is a reasonable fee, which said fee defendant agreed in said promissory note to pay.

Attorneys for the Plaintiff

Adress of defendant:

Beesley Blumbing Company Foley, Alabama.

Carlton D. Eden d/s/a.
Decennic Supply Co

Roy Beesley

amender Complaint

ALICE J. BUCK, Clerk

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	CIRCUIT	COURT,	BALDWIN	COUNTY
No1	495			

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•		4 ****		om the service hereof, to Bay Minette, against —	•
		4 ****	te of Alabama, at	Bay Minette, against —	
e Circuit Cou		4 ****	te of Alabama, at		
		4 ****	te of Alabama, at ROY BEES	Bay Minette, against —	, Defendant

RECORDED

Plaintiffs

Defendants

THE	STATE	OF A	ALA!	BAMA
	BALDWI	N COL	INTY	

No. 1495

BALDWIN COUNTY

CIRCUIT COURT

CARLTON D. EDEN

ROY BEESLEY

vs.

SUMMONS and COMPLAINT

.

Accord Muss Clerk

1211664 Clerk

COLLINS & GALLAWAY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

May 12, 1950

Sayloo Wilker

A have executed this summons

this may, 18, 195 by leaving a copy with

Roy Bresley

Sheri Deputy Sheri

Deputy Sheriff

STATE OF ALABAMA

BALDWIN COUNTY

CARLTON D. EDEN, doing business | IN THE CIRCUIT COURT

as the OCEANIC SUPPLY COMPANY | OF
Plaintiff | BALDWIN COUNTY, ALABAMA

vs. | AT LAW.

ROY BEESLEY | Case No.

COMPLAINT

The plaintiff claims of the defendant SIX HUNDRED TWENTY ONE and 19/100 DOLLARS (\$621.19), due by promissory note made by him on the 12th day of December, 1949, and payable on the 2nd day of February, 1950, with interest thereon.

Attorneys for the Plaintiff

Address of defendant:

Beesley Plumbing Company Foley, Alabama

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CIRCUIT COURT, BALDWIN COUNTY

No.1495______TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

	Roy Beesley	The second secon	
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to appear and r	plead, answer or demur, with	in thirty days from the service h	ereof, to the complaint filed in
the Circuit Cou	art of Baldwin County, State	of Alabama, at Bay Minette, a	gainst
the Circuit Cou	nrt of Baldwin County, State	of Alabama, at Bay Minette, a	gainst, Defendant
		of Alabama, at Bay Minette, a	
by			

RECORDED No. 11495 Page	5-9-5
THE STATE OF ALABAMA BALDWIN COUNTY	Defendant lives at
CIRCUIT COURT	RECEIVED IN OFFICE
CARLTON D. EDEN, d/b/a	11/19 8, 19.50
OCEANIC SUPPLY COMPANY Plaintiffs	I have executed this summons
vs. ROY BEESLEY	this may = 9,19.5.6 by leaving a copy with
Defendants	may meaning
SUMMONS and COMPLAINT Filed 5-8-50 ,19	THE STATE OF THE S
anoch reluch, Clerk	The College and the College an
Callins. 7 Ballyway Plaintiff's Attorney	Taylor Wilkins Sheri Edligh Malberity Sheri
Defendant's Attorney	Edluga Malberns steri

COLLINS AND GALLOWAY
ATTORNEYS-AT-LAW

FRED G. COLLINS THOMAS M. GALLOWAY

PHONE 3-8921

224 GRAYSTONE BUILDING

MOBILE 11. ALABAMA

August 23, 1950

Miss Alice J. Duck, Clerk Gircuit Court of Baldwin County Bay Minette, Alabama

> Re: Carlton D. Eden Vs. Roy Beesley, No. 1495.

Dear Miss Duck:

My client, the plaintiff, in the referenced case has requested that I dismiss this case.

Will you kindly enter an order dismissing the referenced case, and notify me of the date of the order along with the Bill for Court Costs, which will be paid by return mail.

Thank you.

Yours very truly,

Collins and Galloway

Fred G. Collins

cc: Mr. Cecil Chason Attorney at Law Foley, Alabama COLLING AND GALLOWAY

SZE GRAYGTONE BUILDING

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oo; Mr. Geenl Ohnson Afrontop of Let Boley, ilabana Hon. Cecil G. Chason Attorney at Law Foley, Alabama

Re: Carlton D. Eden VS. Roy Beasley Standard Brass & Mfg. Co. VS. Roy Beasley

Dear Mr. Chason:

In regards to the demirrers filed by you as attorney for the defendant in the referenced cases. I have received notice from Miss Duck, Clerk of the Circuit Court of Baldwin County, that the Judge of the Court will hear argument on the demirrers at any time convenient for both attorneys to be present.

I would prefer to submit the demurrers for a ruling without argument. Would this be satisfactory to you? I will notify Miss Duck, by copy of this letter, of my intention to submit for a ruling without argument, and if such is satisfactory to you would you please notify her to that effect, with a copy to me.

If you prefer arguing the demurrers before the Court, then please let me know what day will be convenient for you, and I will do my best to accommodate you.

Very truly yours,

Collins & Galloway

Fred G. Collins

co: Wiss Alice J. Duck Circuit Court of Baldwin County Bay Minette, Alabama

FGC/mls