

1499

R. C. ERDMAN, Individually and
d/b/a/ R. C. Erdman Plumbing and
Heating Company,

Plaintiff

vs.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

BONIE CONSTRUCTION COMPANY,

Defendant

ANSWER

COUNT I: Comes the Defendant and denies the indebtedness in the Complaint.

COUNT II: There was no verified itemized statement of account filed with the complaint served on the defendant.

COUNT III: The Defendant assumes that the claim is based on plumbing work done on a house built for Dr. and Mrs. Brantley in Elberta, Alabama, and alleges that the Defendant paid to the Plaintiff all monies due him for all work done at its request and that if the Plaintiff did work as claimed it was at the request of Dr. and Mrs. Brantley after they had taken possession of the premises.

G. H. Bonie

Forest A. Christian
Forest A. Christian,
Attorney for Defendant

Sworn to and subscribed before me this
the 27th day of June, 1950, by G. H.
Bonie.

Henry P. Shultz
Notary Public

RECORDED

Plaintiff

BONIE CONSTRUCTION COMPANY?

Defendant

AT LAW

Filed 6-24-59
Reic French
Clerk

STATE OF ALABAMA)

BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Bonie Construction Co., Defendant, 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 R. C. Erdman, individually and doing business as R. C. Erdman Plumbing and Heating Company, Plaintiff.

Witness my hand and seal this 24th day of May, 1950.

Henry J. Duck
Clerk

R. C. ERDMAN, individually and)
d/b/a R. C. Erdman Plumbing and)
Heating Company,)

PLAINTIFF)

VS)

BONIE CONSTRUCTION COMPANY)

DEFENDANT)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

The Plaintiff claims of the Defendant Two Hundred Four and 68/100 (\$204.68) Dollars due from it by account stated between Plaintiff and Defendant on the 14th day of January, 1949, which sum of money with interest thereon is due and unpaid, and is the property of the Plaintiff.

The account upon which this action is based is evidenced by itemized verified statement filed herewith.

Chas. H. Thompson
Attorney for Plaintiff

Received in Sheriff's Office
this 24 day of May 1950
TAYLOR WILKINS, Sheriff

Executed June 2 1950
by serving copy of within Summons and
Complaint on

H. H. Bonie
Bonie Construction Co

Taylor Wilkins Sheriff
By H. H. Hall Deputy Sheriff

1499

RECORDED

R. C. ERDMAN, individually and
d/b/a R. C. Erdman Plumbing and
Heating Company,

Plaintiff

Vs

Bonie Construction Co.

Defendant

SUMMONS AND COMPLAINT

FILED
MAY 24 1950
ALICE J. DUCK, Clerk

From the law office of
C. LeNoir Thompson
Bay Minette, Alabama

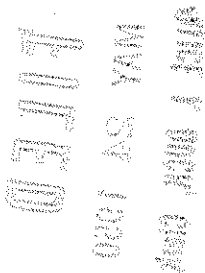
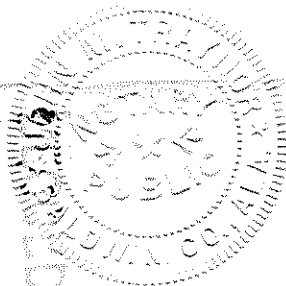
STATE OF ALABAMA
COUNTY OF BALDWIN

Before me, the undersigned Notary Public,
personally appeared R. C. Erdman, who being first duly
sworn deposes and says that he is R. C. Erdman, and as
such has knowledge of the correctness of the account be-
tween said R. C. Erdman and Bonie Construction Company,
doing business as R. C. Erdman Plumbing and Heating, and
that the attached itemized statement correctly shows such
account after allowing all proper credits.

R. C. Erdman

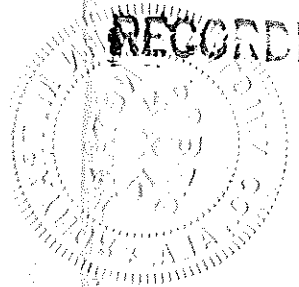
Subscribed and sworn
to before me this 20
day of January, 1950

John M. Traynor
NOTARY PUBLIC, COUNTY OF BALDWIN, ALABAMA.



1499

RECORDED



R.C. Erdmann
d/b/a R.C. Erdmann
and Plumbing Co

VS.

Bowie Construction Co.

JOHN H. BUELL, COUNTY CLERK, ALABAMA
John H. Buell

FILED
MAY 24 1950
CLERK

R.C. Erdmann

account after allowing all proper credits.

that the attached itemized statement correctly shows each

going business as R. C. Erdmann Plumbing and Heating, and

between said R. C. Erdmann and Bowie Construction Company,

each has knowledge of the correctness of the account per-

sonal deposits and says that he is R. C. Erdmann, and as

personally subscribed R. C. Erdmann, who being first duly

Before me, the undersigned Notary Public,

COUNTY OF BALDWIN
STATE OF ALABAMA