

AMENDED ANSWER

1556

PAN AM SOUTHERN CORPORATION,
A Corporation,
Plaintiff

VS

A. L. McCUE

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

Now comes the Defendant and for answer to said complaint shows
as follows:

1.

That he denies each and every allegations thereof.

2.

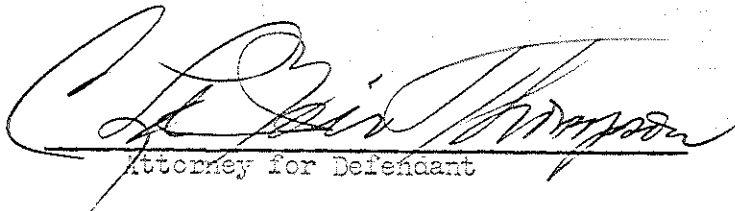
That said defendant has in all things fully complied with the
stipulation and undertakings that said parties and that said plaintiff
has on the date of severance of a contractual relations checked your
defendants accounts and did release him in full at that time.

3.

That prior to the institution of this suit and on to-wit during
the month of January, 1949, Plaintiff and Defendant compromised the
claim sued upon wherein and whereby the defendant paid to the plaintiff
certain sums, the amounts of which he is unable to say specifically, and
plaintiff by it's agents and the defendant signed certain papers, copies
of which were not furnished to the defendant by the plaintiff as settle-
ment in full of all of the plaintiff's claims against the defendant and
release of such claims against the defendant; where the defendant says
he is not liable to the plaintiff.

4.

The defendant for answer to the said complaint, saith that he has
paid the debt for the recovery of which this suit was brought, before
the action was commenced.


Attorney for Defendant

RECORDED

15-5-6

PAN AM SOUTHERN CORPORATION,
A Corporation,

Plaintiff

Vs

A. L. McCUE

Defendant.

AMENDED ANSWER

FILED

APR 12 1951

ALICE J. DUCK, Clerk

From the law offices of
C. Lenoir Thompson
Bay Minette, Alabama

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon A. L. McGue, 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 Pan Am Southern Corporation, a Corporation.

Witness my hand this 5th day of September, 1950.

Archie J. Smith
Clerk.

COMPLAINT

PAN AM SOUTHERN CORPORATION,
A Corporation,

Plaintiff,

vs.

A. L. McCUE,

Defendant.

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

The Plaintiff claims of the Defendant Two Hundred Eighteen and 16/100 Dollars (\$218.16) due from him by account on the 28th day of January, 1949, which sum of money, together with the interest thereon is still unpaid.

Chason & Stone

By: M. J. Stone
Attorneys for Plaintiff.

Received in Sheriff's Office
this 2nd day of Sept, 1950
TAYLOR WILKINS, Sheriff

Executed Sept 9 - 1950
By Serving copy on.

A. L. McCue

Sheriff

Taylor Wilkins

By

Edwigh Steinhorn

File Hope
RECORDED
NO 1656

SUMMONS & COMPLAINT

PAN AM SOUTHERN CORPORATION,
A Corporation,

Plaintiff,

vs.

A. L. McCUE,

Defendant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

Filed 9-5-50
Concurrence
Clerk

LAW OFFICES
HYBART, CHASON & STONE
BAY MINETTE, ALABAMA

PAN AM SOUTHERN CORPORATION,
A Corporation,
Plaintiff

vs

A. L. McCUE
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

Now comes the Defendant and for answer to said complaint shows
as follows:

1.

That he is not guilty of any of the matters alleged therein.

2.

That he neither owed nor promised to pay any of the sums of the
money claimed by said plaintiff.

3.

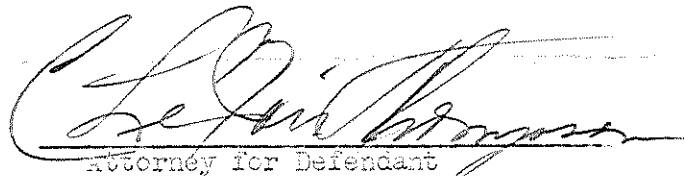
Said defendant denies each and every allegation of said complaint
charging him with failure or default.

4.

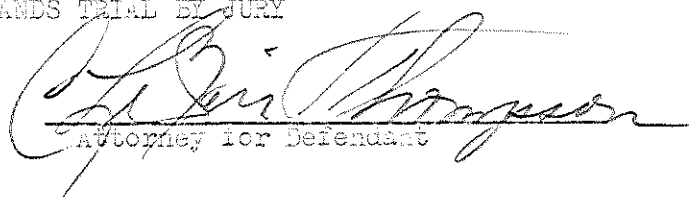
~~That said defendant has in all things fully complied with the~~
stipulation and undertakings that said parties and that said plaintiff
has on the date of severance of a contractual relations checked your
defendants accounts and did release him in full at that time.

5.

That at the time of entering into a contractual relation with the
plaintiff the defendant was not informed as to the fine print, the
basis of said complaint, but was instructed by plaintiff's agents
to execute certain instruments without the defendant being informed as
to contents.


Attorney for Defendant

DEFENDANT DEMANDS TRIAL BY JURY


Attorney for Defendant

RECORDED

RECORDED

PAN AM SOUTHERN CORPORATION,
A Corporation,
Plaintiff

vs

A.L. McGUE
Defendant

ANSWER

LAW OFFICES

C. LeNoir Thompson
Bay Minette, Alabama

FILED

SEP 29 1960

ALICE J. DUCK, Clerk

"MOTION TO REQUIRE SECURITY FOR COST"

PAN AM SOUTHERN CORPORATION,
A CORPORATION

Plaintiff

VS

A.L. McCUE

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW,

CASE NO: 1556

TO THE HONORABLE TELFAIR J. WASHBURN, JUDGE OF THE CIRCUIT
COURT, BALDWIN COUNTY, ALABAMA.

Now comes the Defendant in the above entitled cause and moves
the Court to compel, by order, the Plaintiff, a non-resident
corporation of the State of Alabama, to give a good and sufficient
security for the cost in the above styled cause in accordance with
Title 11 Section 59 of the 1940 Code of Alabama.

C. LeNoir Thompson
Attorney for the Defendant

STATE OF ALABAMA
BALDWIN COUNTY.

Before me, *[Signature]*, in and for
said county and state, personally appeared C. LeNoir Thompson,
known to me, who being duly sworn, deposes and says that he is of
counsel for the defendant in the foregoing cause, and as such has
knowledge of the facts set out to be not a corporation organized
under the laws of the State of Alabama.

C. LeNoir Thompson

Sworn to and subscribed before
me this 27 day of September, 1950.

[Signature]
Notary Public

(Should said be approved ~~and~~, the defendant demands trial by jury)

C. LeNoir Thompson
Attorney for the Defendant

RECORDED

PAN AM SOUTHERN CORPORATION,
A Corporation,

Plaintiff,

vs

A. L. McCUE,

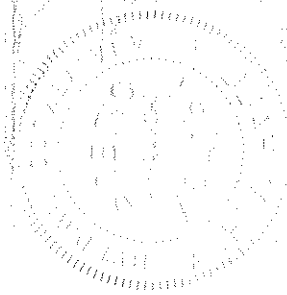
Defendant.

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

Law Offices

C. LENOIR THOMPSON

Bay Minette, Alabama



1554

Nº 13678

ALICE J DUCK/CLERK OF THE CIRCUIT COURT
OF BALDWIN COUNTY ALABAMA
BALDWIN COUNTY ALA

DESCRIPTION	DATE	NUMBER	AMOUNT	DEDUCT	NET
SECURITY FOR COSTS IN SUIT OF PASC VS. A L MC CUE	2/12	F457	15.00		15.00 S-

PLEASE DETACH BEFORE DEPOSITING

CHASON & STONE
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

JOHN CHASON
NORBORNE C. STONE

February 20, 1951

PHONE 3641

Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

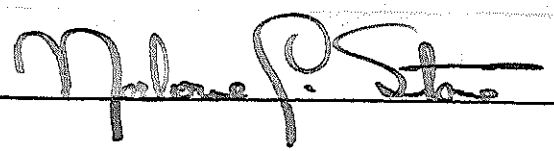
Re: Pan Am Southern Corporation
v. A. L. McCue

We hand you herewith check of Pan Am Southern Corporation #13678 in the amount of \$15.00 payable to your order as security for costs in the above styled cause.

Inasmuch as the attorney for defendant has filed a motion requiring such deposit we would like for you to have the Judge note on the docket sheet that such security has been deposited by the Plaintiff in accordance therewith.

Yours very truly,

CHASON & STONE

By: 

NCS:am
CC: Messrs Cobb & Wright
Attorneys at Law
Whitney Bank Building
New Orleans, Louisiana

THE UNIVERSITY OF CHICAGO
LIBRARY

1556