

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1664

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Granville T. Patterson and Eunice^B Pattersonto 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 _____Granville T. Patterson and Eunice B. Patterson, Defendant

by _____

E. B. Overton, Plaintiff.....Witness my hand this 29th day of May 19.....51..W. J. Overton, Clerk

No. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS and COMPLAINT

Filed, 19.....

....., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

....., 19.....

....., Sheriff

I have executed this summons

this, 19.....

by leaving a copy with

..... Sheriff

..... Deputy Sheriff

E. B. OVERTON,
PLAINTIFF

VS

GRANVILLE T. PATTERSON
AND EUNICE B. PATTERSON,
DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

FIRST: The plaintiff claims of the defendants the sum of Seven Hundred (\$700.00) Dollars, for this that on or about October 21, 1950, the defendants employed the plaintiff, who was a licensed real estate broker doing business in the City of Fairhope, Alabama, to obtain for them a purchaser for certain real estate described as follows:

The West half of Lot 2 of square 8 of the Village of Montrose according to map recorded in Deed Book "E", at page 188, being 1 acre, more or less, in Baldwin County, Alabama,

at the price of Fourteen Thousand (\$14,000.00) Dollars, and agreed to pay him therefor five percent of the said selling price, and the plaintiff alleges that he did, within the time specified in his employment and while he was so employed by the defendants as aforesaid, on to-wit: March 2, 1951 obtain purchasers for said property, namely, Hans Clausen and Marie Clausen, for and at the purchase price aforesaid, and that the said defendants did sell the said lands to the said purchasers for and at the said price; and that the said defendants have failed and refused to pay the agreed sum for such service aforesaid, namely Seven Hundred (\$700.00) Dollars; hence this suit.

SECOND: The plaintiff claims of the defendants the sum of Seven Hundred (\$700.00) Dollars, due from them by account between the defendants and plaintiff on to-wit: the 2nd day of March, 1951, which sum of money, with interest thereon is still unpaid.

THIRD: The plaintiff claims of the defendants the sum of Seven Hundred (\$700.00) Dollars for work and labor done by the plaintiff for the defendants on to-wit: the 2nd day of March, 1951, which sum of money, with interest thereon is still unpaid.

W. B. Beebe
Attorney for Plaintiff

FILED

5-29-57

ALICE J. DUCK, Clerk

701664
E. B. Overton,
Plaintiff

vs

Granville T. Patterson and
Eunice B. Patterson
Defendants

Complaint

suit on account

FILED

MAY 29, 1951

ALICE J. DUCK, Clerk

*Fairhope
Phone 7054*

Received in Sheriff's Office
this 29 day of May, 1951
TAYLOR WILKINS, Sheriff

Executed 6-16 1951
by serving copy of within Summons and
Complaint on

Granville T. Patterson
Eunice B. Patterson

Taylor Wilkins Sheriff
By H. F. Hall Deputy Sheriff

Richard Hall

Black

E. B. OVERTON

PLAINTIFF

VS

GRANVILLE T. PATTERSON
AND EUNICE B. PATTERSON

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 1664

Now come the Defenants separately and severally and demur to the Plaintiff's complaint, and to each count thereof separately and severally and forgrounds say:

1.

That said count does not state a cause of action.

2.

That said count does not state whether the alleged contract between the Plaintiff and the Defendants was oral or in writing.

3.

That said count does not set out the terms and conditions of the alleged contract of employment between the Plaintiff and Defendants.

4.

That said count does not allege that the Defendants were the owners of the property described in the bill of complaint on, to-wit, March 2, 1951.

5.

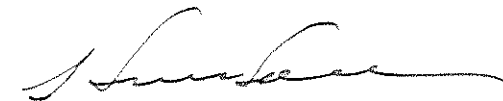
For ought appears the Defendants were not the owners of the property described in the bill of complaint on the date alleged, to-wit, March 2, 1951.

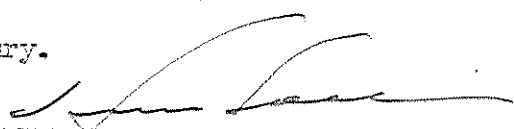
6.

That said count does not allege that the Plaintiff produced a purchaser ready, able and willing to purchase the property involved.

7.

That said count does not set out the terms and conditions under which the Plaintiff was authorized and employed to sell the property belonging to the Defendants.


Attorney or the Defendants


Attorney for the Defendants

The defendants demand a trial by jury.

FILED

6-27-57

ALICE L. BUCK, Clerk

1664

1664

E. B. OVERTON

PLAINTIFF

VS

GRANVILLE PATTERSON AND
EUNICE B. PATTERSON

DEFENDANTS

DEMURRERS

FILED
JUN 27 1951
ALICE J. DUCK, Clerk