

D. G. BROCK, AS EXECUTOR
OF THE ESTATE OF J. H. BROCK
DECEASED,

PLAINTIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

DAY SIDE

NO. 1707

DEFENDANT


Now comes the Defendant and for answer to the Plaintiff's complaint
and to each count thereof separately and severally says:

1.

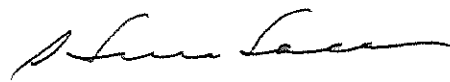
That the facts therein are untrue.

2.

That the account sued on was paid in full before the commencement of
this suit.


Attorney for Defendant

The Defendant demands a trial by jury.


Attorney for Defendant

1001707
RECORDED

D. G. BROCK, AS EXECUTOR
OF THE ESTATE OF J. H. BROCK,
DECEASED,

PLAINTIFF

VS

PAT BROCK

DEFENDANT

ANSWER

FILED
OCT 3 1951
ALICE J. DUCK, Clerk

CHASON & STONE
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

JOHN CHASON
NORBORNE C. STONE

February 26, 1952

PHONE 3641

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

Dear Mrs. Duck:

Re: D. G. Brock as Executor of
the Estate of J. H. Brock,
Deceased, v. Pat Brock

We have this day been requested by Mr. James N. Daniel, who represents the Plaintiff in the estate proceeding in Florida to dismiss the above suit and this is your authority to dismiss such suit.

The court costs had accrued in such suit in the sum of \$9.90 and we had made a deposit for costs in the sum of \$25.00 and we hereby acknowledge receipt of your check payable to Mr. D. G. Brock, as Executor of the Estate of J. H. Brock, in the sum of \$15.10

Yours very truly,

CHASON & STONE

By: 

JC:am
CC: Mr. James N. Daniel
Attorney at Law
Chipley, Florida

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 Pat Brock 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 D. G. Brock, as Executor of the Estate of J. H. Brock, Deceased.

Witness my hand this 26th day of September, 1951.

Alvin J. Smith
Clerk.

COMPLAINT:

D. G. BROCK, as Executor of the
Estate of J. H. Brock, Deceased,
Plaintiff,

vs.

PAT BROCK,

Defendant.

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

COUNT I

The Plaintiff claims of the Defendant the sum of One Thousand Ninety-eight and no/100 Dollars (\$1,098.00) due from him by account on, to-wit July 1, 1949, which sum of money, together with interest thereon is due and unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of One Thousand Ninety-eight and no/100 Dollars (\$1,098.00) due from him on account stated between the decedent, J. H. Brock, and the Defendant, on to-wit, July 1, 1949, which sum of money, together with interest thereon is due and unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of One Thousand Ninety-eight and no/100 Dollars (\$1,098.00) due from him for merchandise, goods and chattels sold by J. H. Brock to the Defendant on, to-wit July 1, 1949, which sum of money, together with interest thereon is due and unpaid.

Robert T. Stone
Attorneys for Plaintiff.

Received in Sheriff's Office
this 26th day of Sept, 1951
TAYLOR WILKINS, Sheriff

RECORDED

201707

SUMMONS AND COMPLAINT

Served 9-28 1951
by serving copy of within Summons and
Complaint on

Pat Brock

D. G. BROCK, as Executor of
the Estate of J. H. Brock,
Deceased.,

Plaintiff,

vs;

PAT BROCK,

Defendant.

Taylor Wilkins Sheriff
By W. F. Hall Deputy Sheriff

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

Filed: September 26th, 1951.

Archie French
Clerk

LAW OFFICES
HUBBART, CHASON & STONE
BAY MINETTE, ALABAMA