

1772

STATE OF ALABAMA,
COUNTY OF BALDWIN.

TO ANY SHERIFF OF THE STATE OF ALABAMA--GREETING:

You are hereby commanded to summon L. M. STYRON, 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 T. M. MOSS , Doing Business as Gordon Motor Company, Foley, Alabama.

Witness my hand, this 19th day of March, 1952.

W. J. Wicks
CLERK.

T. M. MOSS, Doing Business
as Gordon Motor Company,

Plaintiff,

VS.

L. M. STYRON,

Defendant.

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NO. _____

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

COMPLAINT.

COUNT ONE.

The Plaintiff claims of the Defendant Five Hundred and Thirty Dollars (\$530.00), due from him by account on the 1st day of April, 1949, which sum of money, with interest thereon, is still unpaid.

COUNT TWO.

The Plaintiff claims of the Defendant Five Hundred and Thirty Dollars (\$530.00) for work and labor done and materials furnished for the Defendant by the Plaintiff, with interest thereon, from the 1st day of April, 1949, which sum of money is still unpaid.

W. J. Wicks
Attorney for Plaintiff.

CECIL G. CHASON

ATTORNEY AT LAW
FOLEY, ALABAMA

17 March 1952

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

Dear Mrs. Duck:

Enclosed herewith is a summons and complaint
by T. M. Moss against L. M. Stryon. Stryon resides
near Bon Secour.

Yours very truly,


C. G. Chason

CGC:fu

Enclos.

1772.

J. M. Mass
d/b/a Gordon Motor Co.

US.

L. M. Styron

on account

Filed 3-19-52

T. M. MOSS, Doing business
as Gordon Motor Company,

Plaintiff,

VS:

L. M. STYRON,

Defendant.

NO. 1772

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

ANSWER

COUNT I:


The Defendant, for answer to each count of the complaint and saith
that the account is barred by the statute of limitations of three years.

COUNT II:

The Defendant, for answer to each count of said complaint saith that he
is not indebted to the Plaintiff.

COUNT III:

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


Attorney for Defendant

RECORDED

T. M. MOSS, Doing business as
Gordon Motor Company,

Plaintiff,

VS;

L. M. STYRON,

Defendant.

NO. 1772

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

FILED

MAY 20 1952

ALICE A. DUCK, Clerk

this 7 day of *March* 1952
TAYLOR WILKINS, Sheriff

Executed 4 - 22 - 1952
By Sending copy on

L. M. Styron

Sheriff
Taylor Wilkins
By
Edleigh Steadham

1701172
RECORDED

COMPLAINT

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

T. M. MOSS, Doing Business
as Gordon Motor Company,
Plaintiff,

VS.

L. M. STYRON,
Defendant.

FILED
MAR 19 1952
ALICE J. BUCK, Clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA