

DUCK'S WELDING AND REPAIR
SERVICE,

PLAINTIFF

VS

RUDOLPH JACOBY AND SAM
JACOBY, individually and
doing business as AMERICAN
BASKET AND CONTAINER COMPANY

DEFENDANTS

IN THE CIRCUIT COURT OF

BAIDWIN COUNTY, ALABAMA,

AT LAW

NO. 1815


Now come the Defendants and for answer to the Plaintiff's complaint
and to each count thereof separately and severally say:

1.

The facts therein alleged are untrue.


Attorney for the Defendants

The Defendants demand a trial by jury.


Attorney for the Defendants

1815
~~1825~~
RECORDED

Duck's Welding and Repair
Service,

Plaintiff

vs

Adolph Jacoby and Son
Jacoby, individually and
doing business as American
Basket and Container Company

AND WHERE

FILED
JUL 14 1952
ALICE J. DUCK, Clerk

Received in Sheriff's Office
this 16 day of June, 1952
TAYLOR WILKINS, Sheriff

Executed 6-24 1952
by serving copy of within Summons and
Complaint on

Rudolph Jacoby
Sam Jacoby

Taylor Wilkins Sheriff
By George Hartley Deputy Sheriff

RECORDED

701815

SUMMONS AND COMPLAINT

DUCK'S WELDING AND REPAIR
SERVICE,

Plaintiff,

vs.

RUDOLPH JACOBY and SAM JACOBY,
Individually and doing business
as AMERICAN BASKET AND CONTAINER
COMPANY,

Defendants.

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

filed 6-16-52
Arling J. French
clerk
LAW OFFICES
HYBART, CHASON & STONE
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 Rudolph Jacoby and Sam Jacoby, individually, and doing business as American Basket and Container Company, 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 Duck's Welding and Repair Service.

Witness my hand this 16th day of June, 1952.

Reuben J. Wren
Clerk.

COMPLAINT:

DUCK'S WELDING AND REPAIR
SERVICE,

Plaintiff,

vs.

RUDOLPH JACOBY and SAM JACOBY,
individually and doing business
as AMERICAN BASKET AND CONTAINER
COMPANY,

Defendants.

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

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Two Hundred Twenty-five Dollars (\$225.00) due by them by account on to-wit, March 24, 1952, which sum of money, together with the interest thereon is due and unpaid.

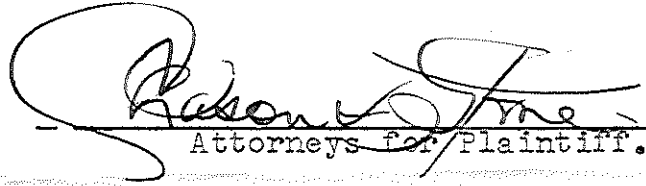
COUNT TWO:

The Plaintiff claims of the Defendants the sum of Two Hundred Twenty-five Dollars (\$225.00) due by them on account stated between the Plaintiff and Defendants, on to-wit, the 1st day of April, 1952, which sum of money, together with the interest thereon is due and unpaid.

COUNT THREE:

The Plaintiff claims of the Defendants the sum of Two Hundred Twenty-five Dollars (\$225.00) due from them for work and labor done

for the Defendants by the Plaintiff on to-wit, from March 17, 1952,
to March 24, 1952, at their request, which sum of money, together
with the interest thereon is due and unpaid.


Attorneys for Plaintiff.

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