

T. L. MARTIN and D. G. STAGG, partners trading
as WAYNE FEED COMPANY,
Plaintiffs
-vs-
JAMES H. LUTHER,
Defendant

:
:
:
:
:
:

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
NO. 1963

COUNT ONE

The Plaintiffs claim of the Defendant the sum of
FIVE THOUSAND EIGHT HUNDRED and No/100 (\$5,800.00) DOLLARS
due from him by account on, to-wit, the 12th day of June, 1952,
which sum of money, with the interest thereon, is still unpaid.

COUNT TWO

The Plaintiffs claim of the Defendant the sum of
FIVE THOUSAND EIGHT HUNDRED and No/100 (\$5,800.00) DOLLARS,
on account stated between the Plaintiffs and Defendant on,
to-wit, the 12th day of June, 1952, which sum of money, with
the interest thereon, is still unpaid.

COUNT THREE

The Plaintiffs claim of the Defendant the sum of
FIVE THOUSAND EIGHT HUNDRED and No/100 (\$5,800.00) DOLLARS,
for merchandise, goods and chattels sold by the Plaintiffs to
the Defendant on, to-wit, the 12th day of June, 1952, which
sum of money with the interest thereon, is still unpaid.

Herndon Sage Jr.
Attorney for Plaintiffs

Defendant's address:
Robertsdale, Alabama

Received in Sheriff's Office 4-14-53
this 10 day of April, 1953
TAYLOR WILKINS, Sheriff

1963

Executed April 14, 1953
By Seaming

James, H. Luther

J. L. Martin & W. H. Stegg
trading as -
Wayne Feed Co.
vs.

James W. Luther

Shuff
Taylor Wilkins
By
Edleigh Steadham

FILED

4-10-53

ALICE A. DUCK, Clerk

T. L. MARTIN and D. G.
STAGG, partners trading
as WAYNE FEED COMPANY,

Plaintiffs

vs

JAMES H. LUTHER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____.

Comes the Defendant in the above styled cause and for answer to
the complaint and says as follows:

1.

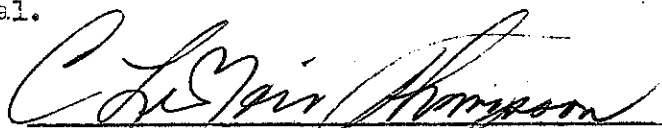
As to Count One, he denies the allegations of the complaint.

2.

As to Count Two, he denies the allegations of the complaint.


Attorney for the Defendant.

Defendant demands a Jury Trial.


Attorney for the Defendant.

1963 July

FILED

4-29-53

ALICE J. DICK, Clerk

HERNDON INGE, JR.

ATTORNEY AT LAW

617-21 FIRST NATIONAL BANK BUILDING

POST OFFICE BOX ⁴³⁵~~272~~

MOBILE 2, ALABAMA

April 9, 1953

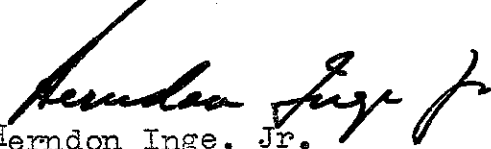
Mrs. Alice J. Duck
Clerk, Circuit Court of Baldwin County
Court House
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed please find complaint and summons
in duplicate to be filed in your Court. I will appre-
ciate it if you will accept it and acknowledge receipt
of the same.

With many thanks for your kindness and with
kindest regards, I am

Yours very truly,


Herndon Inge, Jr.

HI:nl
Enc.

1963

J. L. Martin & W. B. Stagg
Trading as Wayne Feed Co
vs.

James L. Luther

on acct

FILED

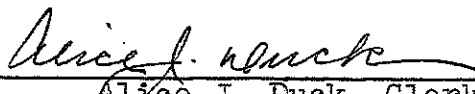
4-10-5-11.

ALICE J. DUCK, Clerk

STATE OF ALABAMA : TO ANY SHERIFF IN THE
COUNTY OF BALDWIN : STATE OF ALABAMA

You are hereby commanded to summon James H. Luther to appear and plead, answer or demur, within thirty days from service hereof to the complaint filed in the Circuit Court of Baldwin County, Alabama, At Law, by T. L. Martin and D. G. Stagg, partners trading as Wayne Feed Store, as Plaintiffs, and against James L. Luther, as Defendant.

Witness my hand this 10th day of April, 1953.



Alice J. Duck, Clerk