

1982

BERTIE L. FRISHKORN,

Plaintiff,

vs.

JESSIE STEWART,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

Comes the Defendant in the above styled cause and demurs to the Complaint filed in said cause and to each and every count thereof, separately and severally, and assigns the following separate and several grounds, viz:

1. That said Complaint does not state a cause of action.
2. That Count II of said Complaint affirmatively shows that the Defendant is not due the Plaintiff the sum of money referred to therein.
3. That sufficient facts are not alleged in Count II of the Complaint to show that the Defendant is indebted to the Plaintiff for the sum sued on therein.
4. That Count II of the Complaint is vague and indefinite.

Sharon Stone
Attorneys for Defendant.

Defendant demands a trial
of this cause by Jury.

Sharon Stone
Attorneys for Defendant.

1982
RECORDED

Jury

DEMURRER

BERTIE L. FRISHKORN,

Plaintiff,

vs.

JESSIE STEWART,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

Filed: May 26, 1953.

Archie J. Smith

Clerk

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

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

YOU ARE HEREBY COMMANDED to summon JESSIE STEWART to 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 JESSIE STEWART, by BERTIE L. FRISHKORN.

WITNESS my hand this the 4th day of May, 1953.

Alice J. Luck
Clerk

COMPLAINT

BERTIE L. FRISHKORN,)	
PLAINTIFF)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA
JESSIE STEWART,)	AT LAW
DEFENDANT)	

COUNT I:

The Plaintiff claims of the Defendant the sum of TWO HUNDRED NINETY-EIGHT & 78/100 DOLLARS (\$298.78), due from him for money loaned by the Plaintiff to the Defendant on the 11th day of May, 1951, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of TWO HUNDRED NINETY-EIGHT & 78/100 DOLLARS (\$298.78) due from him for money loaned by CLARENCE L. DARDEN to the Defendant on the 11th day of May, 1951, which sum of money, with interest thereon, is still unpaid, and is the property of the Plaintiff.

Forest A. Christian
Forest A. Christian, Foley
Attorney for Plaintiff

The Defendant resides in Southeast
Robertsdale, Alabama.

this day of May 1953
TAYLOR WILKINS, Sheriff

Executed May, 7, 1953
By Serving copy on
Jessie Stewart

RECORDED

BERTIE L. FRISHKORN,

PLAINTIFF

VS.

JESSIE STEWART,

DEFENDANT

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Sheriff
Taylor Wilkins
By
Edleigh Steadham

Filed 5-4-53
Receiv. clerk.

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA