

STATE OF ALABAMA
BALDWIN COUNTY

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

You are hereby commanded to summon MRS.THERESA LOCHRICO
of GULF SHORES, ALABAMA, to appear before the Circuit
Court of Baldwin County, Alabama, at the place of holding the
same and plead, answer or demur, within thirty days from ser-
vice hereof to the complaint of K.A. MANRING

Witness my hand, this 20 day of Oct, 1969.

Alice J. Duck
CLERK

* * * * *

K.A. MANRING)

Plaintiff)

vs.)

MRS. THERESA LOCHRICO)

Defendant)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

No. 894

COMPLAINT

The Plaintiff claims of the Defendant the sum of
THREE HUNDRED AND 19/100ths (\$300.19) DOLLARS as damages for Nov. 5
breach of a conditional sales contract, executed on Oct. 4,
1966, whereby Plaintiff agreed to deliver goods to
Defendant and Defendant agreed to pay the purchase price.
And although the Plaintiff has complied with all its provi-
sions on his part, the Defendant has failed to pay the pur-
chase price, and the amount due is \$210.19, and Plaintiff
also asks for a reasonable attorney's fee for collection as
provided in the contract, in the amount of \$90.00.

Daniel E. Robison
Daniel E. Robison
Plaintiff's Attorney

FILED

OCT 20 1969

Alice J. Duck CLERK
REGISTER

24:11/5/69

Ms. 8941

R. A. Manning

VS.

Mrs. Theresa Lockrich

Sheriff claims 100 miles at
Ten Cents per mile Total \$10.00
BY *[Signature]* TAYLOR WILKINS, Sheriff
DEPUTY SHERIFF

Received 20 day of Oct 1969
and on 5 day of May 1969
I served a copy of the within doc on [Signature]
By service on [Signature]

FILED

OCT 20 1969

ALICE J. DUCK

CLERK
REGISTER

W. Robinson


TAYLOR WILKINS, Sheriff
[Signature]

K. A. MANRING, X
Plaintiff, X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA
vs., X AT LAW
MRS. THERESA LOCHRICO, X CASE NUMBER: 8941
Defendant. X


DEMURRER:

Comes the defendant, Mrs. Theresa Lochrico, and for
demurrer says:

Complaint fails to state cause of action.


Attorney for Defendant.

I hereby certify that I have this day mailed a
copy of the foregoing demurrer to the Honorable Daniel E.
Robison, Attorney at Law, Foley, Alabama, postage prepaid.


Attorney for Defendant.

FILED

NOV 13 1969

ALICE J. DUCK CLERK
REGISTER

TO THE HONORABLE JUDGE
OF THE DISTRICT COURT
AT THE CITY OF ALABAMA
IN THE CASE
OF THE PEOPLE OF THE STATE OF ALABAMA
VS. [illegible]

X
X
X
X
X
X

and the defendant, and the

defendant's

complaints to state of action.

ALICE J. BUNK
CLERK
REGISTER

NOV 13 1969

FILED

I hereby certify that I have this day mailed a
copy of the foregoing document to the Honorable Daniel E.
Robinson, Attorney at Law, Foley, Alabama, postage prepaid.

Respectfully,
[Signature]

8891174

10/11/69

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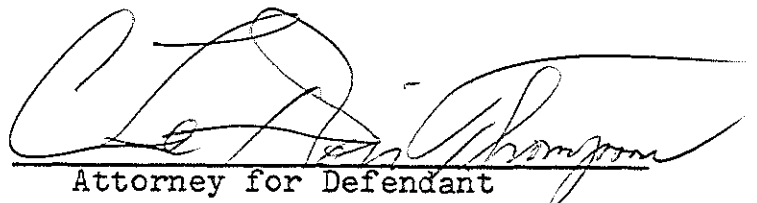
8941

K. A. MANRING !
 Plaintiff !
 vs !
MRS. THERESA LOCHRICO !
 Defendant !

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 8941

Comes the Defendant, Mrs. Theresa Lochrico by
her attorney of record and for answer to the complaint
filed in said cause says:

1. She denies the allegations of said complaint
as untrue.
2. That the said plaintiff, K. A. Manring d/b/a
Western Auto Associate Store of Foley, Alabama recovered
back, property subject of the conditional sales contract
sued on, from the defendant Mrs. Theresa Lochrico prior
to the filing of the said suit in the above styled cause
and said recovery thereby extinguishing plaintiffs right
to sue on the contract or any portion thereof.
3. The defendant for answer to the said complaint,
saith that she has paid the debt, for the recovery of
which this suit was brought, before the action was commenced.

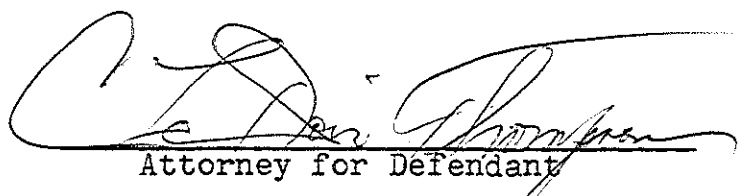

Attorney for Defendant

I hereby certify that I have this day mailed a
copy of the foregoing answer to the Honorable Daniel E.
Robison, Attorney at Law, Foley, Alabama, postage
prepaid, this the 15th day of January, 1970.

FILED

JAN 15 1970

ALICE J. DUCK CLERK
 REGISTER


Attorney for Defendant

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THE COURT OF COMMONS
IN THE MATTER OF
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