MICHAEL J. SALMON
LAWYER
SUITE 324
INTERNATIONAL TRADE CENTER
250 N. WATER STREET
MOBILE ALABAMA 36602

November 17, 1969

Mrs. Alice Duck Clerk, Circuit Court County Courthouse Bay Minette, Alabama

Re: Paul S. Giannini v. Scharlene N. Tyler and William Tyler, At Law Number 8952

Dear Mrs. Duck:

Enclosed is an answer which I would thank you to file for the defendants.

Very sincerely yours,

MICHAEL J. SALMON

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Enclosure

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Scharlene N. Tyler and William Tyler, 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 thereto answer the Complaint of Paul S. Giannini.

Witness my hand, this the 22 day of 1969.

Alice J. Duck, Clerk

PAUL S. GIANNINI,

Plaintiff,

VS.

SCHARLENE N. TYLER and
WILLIAM TYLER,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

X

AT LAW

CASE NO. 9952

Plaintiff claims of the Defendants the sum of TWO HUNDRED TWENTY-TWO AND 88/100 (\$222.88) DOLLARS, due from them by account on the 17th day of June, 1967, which sum of money, with the interest thereon is still unpaid.

2.

Plaintiff claims of the Defendants the sum of TWO HUNDRED TWENTY-TWO AND 88/100 (\$222.88) DOLLARS, due from them for merchandise, goods and chattels sold by the Plaintiff to the Defendants on the 17th day of June 1967, which sum of money with the interest thereon is still unpaid.

WILTERS & BRANTLEY

Defendant's address is: c/o Haciaenda Motel Gulf Shores, Alabama Attorneys for the Plaintiff

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8/16-23-69

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

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CASE NO. 8932

PAUL S. GIANNINI,

Plaintiff,

MILLIAM TYLER, SCHARLENE N. TYLER and

Bay Minette, Alabama Attorneys at Law MILTERS & BRANTLEY

PAUL S. GIANNINI,

: IN THE CIRCUIT COURT OF

Plaintiff,

BALDWIN COUNTY, ALABAMA

vs.

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SCHARLENE N. TYLER and

WILLIAM TYLER,

AT LAW

Defendants.

NUMBER 8952

ANSWER

Come now the defendants separately and severally and for answer to the bill of complaint heretofore filed, and each and every count thereof, file the following separate and several pleas:

1. Not guilty.

2. The allegations of the complaint are untrue.

MICHAEL J. SALMON Attorney for defendants

CERTIFICATE OF SERVICE

I do hereby certify that I have served a copy of the foregoing answer upon Mr. Harry J. Wilters, Jr., Attorney for the plaintiff in this cause, by depositing the same in the United States mail, properly addressed and first class postage prepaid, this 17th day of November, 1969.

MICHAEL J. SALMON Attorney for defendants

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