

LEE DEAN,

Plaintiff,

VS.

PERRY F. GOODRICH,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2050

PLEA

Comes the Defendant in the above styled cause and for plea to the Complaint heretofore filed in the said cause and to each count thereof, separately and severally says:

1. Not guilty.

J. B. Blackum  
Attorney for Defendant.

Defendant demands trial of said cause by jury.

J. B. Blackum  
Attorney for Defendant.

RECORDED

PLEA

LEE DEAN,  
Plaintiff,  
VS.  
PERRY F. GOODRICH,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 2050

FILED

SEP 9 1906

ALICE A. DUCK, Clerk

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 Perry F. Goodrich to appear within thirty (30) 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 Lee Dean.

WITNESS my hand this 30 day of July, 1953.

Resident Clerk  
Clerk

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- COMPLAINT -

LEE DEAN,	)	
	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
-VS-	)	LAW SIDE
PERRY F. GOODRICH,	)	
	)	
Defendant.	)	

- COUNT I -

The Plaintiff claims of the Defendant One Thousand Eight Hundred Ninety-one Dollars (\$1,891.00), due from him for work and labor done for the Defendant by the Plaintiff in January, February, March, April, May and June of 1953, which sum of money, with the interest thereon, is still unpaid.

- COUNT II -

The Plaintiff claims of the Defendant Three Thousand Five Hundred Dollars (\$3,500.00), due from him for Irish Potatoes sold by the Plaintiff to the Defendant in May and June of 1953, which sum of money, with interest thereon, is still unpaid.

[Signature]  
Attorney for Plaintiff

2052

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LEE DEAN,  
Plaintiff,

304  
RICH, P.

Defendant.

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BALDWIN COUNTY, ALABAMA

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JUL 30 1953

Cecil G. Chason Clerk  
Attorney at Law  
Foley, Alabama