

GRAYDON L. NEWMAN
ATTORNEY AT LAW
~~XXXXXXXXXXXXXXXXXXXX~~
BIRMINGHAM 3, ALABAMA
212 Clark Building

3-5417
PHONE ~~XXXX~~

Nov. 28, 1953.

2138

Mrs. Alice J. Duck, Circuit Clerk
Baldwin County, Alabama.

Dear Mrs. Duck:

Will you please file the enclosed complaints and
put your summons and return on same.

The address of J. B. Tisdale, is Grand Bay, in
Mobile County, Alabama.

The address of L. K. Hoover is % Oliver Tractor Co.,
in Robertsdale, Ala. and His wife Allyne R. Hoover works for the
Power Company in Robertsdale, Ala.

You may communicate with me at the above address or
% General Delivery, Gulf Shores Post Office, Gulf Shores, Ala.

Very truly yours,

Graydon Newman
Graydon Newman.

LADY RUTH BARNER
PLAINTIFF

VS

L. K. HOOVER, ALLYNE R.
HOOVER AND J. B. TISDALE,
And L. K. Hoover and J. B.
Tisdale doing business as
the Vitality Goat Dairy

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

TWENTY-EIGHTH JUDICIAL CIRCUIT

OF ALABAMA

Comes the defendant, J. B. Tisdale, in the above styled cause and demurring to plaintiff's complaint and each court thereof separately and severally, says:

1. Said complainant does not state a cause of action.
2. Said complaint does not allege facts sufficient to apprise the defendant of what he is called on to answer.

BEENE & SWEARINGEN

BY

J. W. Beene
Attorneys for J. B. Tisdale

FILED

2-19-54

ALICE L. DUCK, Clerk

1954

Filed 2-19-54
Alice French
Clerk

500 2nd St
San Francisco

LADY RUTH BARNER

PLAINTIFF

VS

L. K. HOOVER, ALLYNE R.
HOOVER AND J. B. TISDALE.
And L. K. Hoover and J. B.
Tisdale doing business as
the Vitality Goat Dairy

DEFENDANTS

IN THE CIRCUIT COURT OF

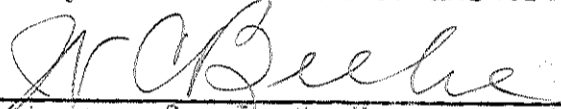
BALDWIN COUNTY, ALABAMA,

TWENTY-EIGHTH JUDICIAL CIRCUIT

OF ALABAMA

Come the defendants, L. K. Hoover and Allyne R. Hoover,
in the above styled cause and demurring to plaintiff's complaint
and each count thereof separately and severally, say:

1. Said complaint does not state a cause of action.
2. Said complaint does not allege facts sufficient to
apprise the defendants of what they are called on to answer.



Attorney for L. K. Hoover, and Allyne
R. Hoover.

FILED

12-31-53

ALICE J. DUCK, Clerk

2138

FILED

APR 1 1953
FBI - TAMPA

File # 71, 1953
Wick J. ...
Clerk

APR 1 1953
FBI - TAMPA

LADY RUTH BARNER
PLAINTIFF

VS

L. K. HOOVER, ALLYNE R.
HOOVER AND J. B. TISDALE.
And L. K. Hoover and J. B.
Tisdale doing business as
the Vitality Goat Dairy

IN THE CIRCUIT COURT OF BALDWIN COUNTY,
TWENTY-EIGHTH JUDICIAL CIRCUIT OF
ALABAMA.

CASE NO. _____

COMPLAINT

COUNT ONE

The plaintiff claims of the defendants sixteen-thousand-eight-hundred dollars with interest at five-per-cent per annum from December 15, 1952 on said sum of money, due by promissory waive note made by them on the 24th day of April, 1947, and plaintiff avers that as part of said note defendants waived their right of exemption as to personal property and agreed to pay a reasonable attorney's fee which plaintiff also claims, to-wit: \$2,000.00.

Count Two.

Plaintiff claims of the defendants the sum of \$1500.00 for money on _____ day of January, 1952, received by the defendants to the use of the plaintiff, which sum of money, with interest thereon, is still unpaid.

Count Three.

Plaintiff claims of the defendants the sum of \$1500.00 for money received by the defendants to the use of the plaintiff, which sum of money, with interest thereon, is due and still unpaid.

Count Four.

Plaintiff claims of the defendants the sum of \$1500.00 for money due by verbal contract, made on to-wit: April 24, 1947, under said agreement defendants were ^{said} to collect and did collect/money due plaintiff from the Vitality Goat Dairy Milk Routes in Birmingham, Jefferson County, Alabama, after said date, and defendants were to pay said money when collected to Plaintiff; plaintiff avers that said sum of money was collected by defendants, their agents or assigns, but that said sum of money collected, has not been paid plaintiff, and that said sum of money, with interest thereon, is still unpaid.

FILED

Gayden Newman

Attorney for Plaintiff.

11-30-53

ALICE I. DUCK, Clerk

THE DISTRICT COURT OF THE COUNTY OF MOBILE, ALABAMA

IN REPLY TO

FILE NO. 100-100

THE DISTRICT COURT OF THE COUNTY OF MOBILE, ALABAMA

IN REPLY TO

FILE NO. 100-100

FILE NO. 100-100

Lady Ruth Barner
Plaintiff

vs

L. K. Hoover, et als,
Defendants.

Original

Please serve copy of this
summons and complaint on:

L. K. Hoover, % Oliver
Tractor Co., Robertsdale,
Ala.

Allyne R. Hoover, % Rural
Power Co., Robertsdale, Ala.

J. B. Tisdale, Grand Bay, in
Mobile, County, Ala.

...received by the receiver, J. B. Tisdale, Grand Bay, in Mobile, Alabama, who is hereby notified that the same are to be held for the use of the receiver, J. B. Tisdale, Grand Bay, in Mobile, Alabama, until the same are sold or otherwise disposed of. The receiver, J. B. Tisdale, Grand Bay, in Mobile, Alabama, is hereby notified that the same are to be held for the use of the receiver, J. B. Tisdale, Grand Bay, in Mobile, Alabama, until the same are sold or otherwise disposed of. The receiver, J. B. Tisdale, Grand Bay, in Mobile, Alabama, is hereby notified that the same are to be held for the use of the receiver, J. B. Tisdale, Grand Bay, in Mobile, Alabama, until the same are sold or otherwise disposed of.

FILED
J. B. Tisdale
Grand Bay, Ala.

1-20-23

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2138

Nov. TERM, 1953

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon L. K. HOOVER, ALYDNE R. HOOVER
AND J. B. TISDALE,

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 _____

L. K. HOOVER, ALYDNE R. HOOVER AND J. B. TISDALE, Defendant_____

by _____
LADY RUTH BARNER, Plaintiff_____

Witness my hand this 30th day of November 1953

Lucy J. Barker, Clerk

BOOK 001 PAGE 50

No. 2138

Page 113

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

LADY RUTH BARNER

Plaintiffs

vs.

L. K. HOOVER, ALLYNE R. HOOVER

& J. B. TISDALE

Defendants

SUMMONS and COMPLAINT

Filed 11-30-53, 1953

Alice J. Duck, Clerk

EXECUTED

This 7 day of Jan 1954
by serving a copy of the within on

Jo. B. Tisdale
W. H. HOLCOMB, Sheriff
Mobile County, Ala.

By: Jo. B. Tisdale Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Nov 30, 1953

Taylor Williams, Sheriff

I have executed this summons

this 11-30, 1953
by leaving a copy with

L. K. Hoover
Allyne R. Hoover

Taylor Williams Sheriff
Edmund Steubert Deputy Sheriff