

21411

LIEN

BOOK 001 PAGE 317

State Of Alabama
County of Baldwin

Frank B. Chaudron files this statement in writing verified by the oath of Frank B. Chaudron, who has personal acknowledged the facts herein set forth:

That said Frank B. Chaudron claims a lien upon the following property, situated in Baldwin County, Alabama to-wit: The Blue Light a Trailway Filling Station situated in Fairhope, Alabama. This lien is claimed, separately and severally, as to both the buildings and improvements thereon, and the said land.

That said lien is claimed to secure an indebtedness of \$80.00 with interest, from to-wit the 6th day of November, 1953 from work and labor done by the Plaintiff for the Defendants.

The name of the owner pr proprietor of the said property is J. T. Farmer.

Frank B. Chaudron
Claimant.

Subscribed and sworn to before me on this the 14th day of December, 1953 by said Claimant.

[Signature]
Notary Public.

FILED

12-14-53

ALICE J. DUCK, Clerk

102141
Frank B. Chaudron

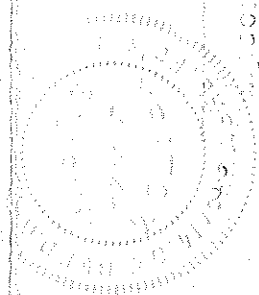
Plaintiff

Vs

J. T. Farmer and
George Porter

Defendants

Lien



FILED
DEC 14 1953
ALICE J. DUCK, Clerk

FRANK B. CHAUDRON,

Plaintiff,

vs.

J. T. FARMER and GEORGE
PORTER,

Defendants.

I

I

I

I

I

I

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

Comes J. T. Farmer, one of the Defendants in the above styled cause and demurs to the Complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said Complaint does not state a cause of action.
2. That said Complaint fails to allege that the work and labor was done at the request of the Defendants or one of them.
3. That said Complaint fails to allege that the work and labor was done at the request of J. T. Farmer.
4. That there is a misjoinder of parties defendant.
5. That said Complaint fails to allege that the sum claimed by the Plaintiff is due.

FILED

12-23-53

ALICE I. DUCK, Clerk

Chas. L. Stone
Attorneys for J. T. Farmer

W 2141

DEMURRER

FRANK B. CHAUDRON,

Plaintiff

vs.

J. T. FARMER and GEORGE
PORTER,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

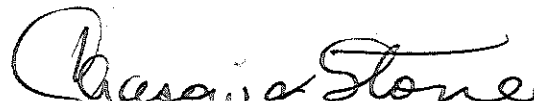
Filed this the 23rd day of
December, 1953.


Clerk

FRANK B. CHAUDRON,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
vs.	I	BALDWIN COUNTY, ALABAMA
J. T. FARMER and GEORGE	I	AT LAW NO. 2141
PORTER,	I	
Defendants.	I	

Comes the Defendant, J. T. Farmer, and for plea to the Complaint filed in said cause, says:

1. That the allegations of the Complaint are untrue.


Attorneys for J. T. Farmer

FILED

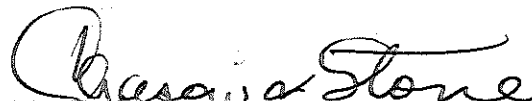
3-24-54

ALICE I. DUCK, Clerk

FRANK B. CHAUDRON,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
vs.	I	BALDWIN COUNTY, ALABAMA
J. T. FARMER and GEORGE	I	AT LAW NO. 2141
PORTER,	I	
Defendants.	I	

Comes the Defendant, J. T. Farmer, and for plea to the Complaint filed in said cause, says:

1. That the allegations of the Complaint are untrue.


Attorneys for J. T. Farmer

FILED

3-24-54

ALICE I. DUCK, Clerk

PLEA

FRANK B. CHAUDRON,

Plaintiff,

vs.

J. T. FARMER and GEORGE PORTER,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2141

Filed this 24th day of March, 1954.

David J. Wenc
Clerk.

Amended Complaint

Frank B. Chaudron

Plaintiff

Vs

J. T. Farmer and
George Porter

Defendants

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In the Circuit Court of
Baldwin County, Alabama
At Law, Case No. 2141

The Plaintiff claims of the Defendants the sum of eighty and 00/100 dollars DUE from them for work and labor done by the Plaintiff for the Defendants at their request, from on to-wit the 6th day of November, 1953, through the 29th day of November, 1953, which sum of money with the interest thereon is still DUE and unpaid.



Attorney for the Plaintiff

Plaintiff demands a trial by Jury.

FILED

3-16-54

ALICE J. DUCK, Clerk


Attorney for the Plaintiff

2141

Frank B. Chaudron

Plaintiff

Vs

J. T. Farmer and George
Porter,

Defendants

Amended Complaint

FILED
MAR 16 1954
ALICE J. HICK, CLERK

State of Alabama
County of Baldwin

To any Sheriff of the State of Alabama:

You are hereby commanded to summon J. T. Farmer and George Porter to appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama against J. T. Farmer and George Porter, Defendants by Frank B. Chaudron, Plaintiff.

Witness my hand, this the 4th day of April 1953.

Alice L. Duck
Clerk.

Frank B. Chaudron

Plaintiff

Vs

J. T. Farmer and
George Porter

Defendants

In the Circuit Court of
Baldwin County, Alabama
At Law.

The Plaintiff claims of the Defendants the sum of Eighty and 00/100 dollars due from them ~~from~~ for work and labor done by the Plaintiff for the Defendants from on to-wit the 6th day of November 1953 through the 29th day of November, 1953, which sum of money with the interest thereon is still unpaid.

Robert F. McQuilley
Attorney for the Plaintiff.

Plaintiff demands a trial by jury.

FILED

12-4-53

ALICE L. DUCK, Clerk

Robert F. McQuilley
Attorney for the Plaintiff.

2141
Frank B. Chaudron
Plaintiff

Vs

J. T. Farmer and
George Porter
Defendants

Summons and Complaint

FILED

DEC 4 1953

ALICE L. DUCK, Clerk

LIEN

State Of Alabama
County of Baldwin

Frank B. Chaudron files this statement in writing verified by the oath of Frank B. Chaudron, who has personal knowledge of the facts herein set forth:

That said Frank B. Chaudron claims a lien upon the following property, situated in Baldwin County, Alabama to-wit: The Blue Light a Trailway Filling Station situated in Fairhope, Alabama. This lien is claimed, separately and severally, as to both the buildings and improvements thereon, and the said land.

That said lien is claimed to secure an indebtedness of \$80.00 with interest, from to-wit: the 6th day of November, 1953 for work and labor done by the Plaintiff for the Defendants.

The name of the owner or proprietor of the said property is J. E. Farmer.

Frank B. Chaudron
Claimant.

Subscribed and sworn to before me on this the 14th day of December, 1953 by said Claimant.

Notary Public.

102141
Frank B. Chaudron

Plaintiff

Vs

J. T. Farmer and
George Porter

Defendants

Lien

FILED
DEC 14 1953
ALICE J. BUCK, Clerk

Received in Sheriff's Office
this 21 day of Dec, 1953
TAYLOR WILKINS, Sheriff

Received _____ day of _____ 19____
and on 15 day of Dec. 1953

I served a copy of the within _____
on J. T. Farmer

By service on Not found as to
George Porter
TAYLOR WILKINS, Sheriff
By H. F. Hall D. S.

Not

State of Alabama
County of Baldwin

To any Sheriff of the State of Alabama:

You are hereby commanded to summon J. T. Farmer and George Porter to appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama against J. T. Farmer and George Porter, Defendants by Frank B. Chaudron, Plaintiff.

Witness my hand, this the 4th day of Dec 1953.

Price J. Neuch
Clerk.

Frank B. Chaudron
Plaintiff

Vs

J. T. Farmer and
George Porter
Defendants

In the Circuit Court of
Baldwin County, Alabama
At Law.

The Plaintiff claims of the Defendants the sum of Eighty and 00/100 dollars due from them ~~xxx~~ for work and labor done by the Plaintiff for the Defendants from on to-wit the 6th day of November 1953 through the 29th day of November, 1953, which sum of money with the interest thereon is still unpaid.

Robert L. McQuib
Attorney for the Plaintiff.

Plaintiff demands a trial by jury.

Robert L. McQuib
Attorney for the Plaintiff.

2171
Frank B. Chaudron

Plaintiff

Vs

J. T. Farmer and
George Porter

Defendants

Summons and Complaint

FILED

DEC 4 1953

ALICE L. DUCK, Clerk

this 14 day of Dec, 1953

TAYLOR WILKINS, Sheriff

received _____ day of _____ 19____

and on 15 day of Dec. 1953

served a copy of the within _____

in Summons & Complaint.

by service on J. T. Farmer

TAYLOR WILKINS, Sheriff

By H. F. Hall D. S.

FRANK B. CHAUDRON,	Ø	
Plaintiff,	Ø	IN THE CIRCUIT COURT OF
vs.	Ø	BALDWIN COUNTY, ALABAMA
J. T. FARMER and GEORGE PORTER,	Ø	AT LAW.
Defendants.	Ø	

Comes the Defendant, J. T. Farmer, and files this his motion to strike the purported lien filed by the Plaintiff in the above styled cause and as grounds for his said motion says:

1. That said motion is not filed according to the laws of the State of Alabama.
2. That said purported lien fails to allege any statutory grounds for such lien.
3. That said lien fails to allege that the work and labor was performed for the Defendant, J. T. Farmer, at his request.
4. That said purported lien fails to state that the services were performed under any contract between the Plaintiff and J. T. Farmer.
5. That said line fails to properly describe the property on which the lien is claimed.

FILED
12-23-53

Chas. A. Stone
Attorneys for J. T. Farmer

ALICE J. DUCK, Clerk

no 2141

MOTION

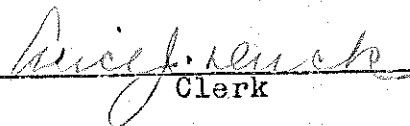
FRANK B. CHAUDRON,
Plaintiff,

vs.

J. T. FARMER and GEORGE
PORTER,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

Filed this the 23rd day of December
1953.


Clerk