

PEARSON BROS. SUPPLY COMPANY, INC.,)  
a Corporation,

Plaintiff,

VS.

LORENE OWENS,

Defendant.

) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA  
) AT LAW  
) CASE NO. 9014  
)

Comes now the Defendant in the above styled cause and for  
answer to the Plaintiff's Bill of Complaint says as follows:

1.

The Complainant's Bill of Complaint fails to state a cause of  
action.

WILTERS, BRANTLEY & NESBIT

BY:

*Phyllis S. Nesbit*  
(Mrs.) Phyllis S. Nesbit

The Defendant demands a trial by jury.

WILTERS, BRANTLEY & NESBIT

BY:

*Phyllis S. Nesbit*

**CERTIFICATE OF SERVICE**

I do hereby certify that I have on this 9<sup>th</sup> day of JANUARY,  
1970, served a copy of the foregoing pleading on counsel for all  
parties to this proceeding by mailing the same by United State  
Mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

By:

*SM Brantley*

**FILED**

JAN 9 1970

ALICE L. [unclear] CLERK  
JAN 10 1970

July

9014

**LETTERS TO BE RECORDED**

To each of the above named persons, a letter has been written, and a copy of the same is being sent to you for your information. The letters are being sent to you by the same mail as the letters to the above named persons.

Yours truly,  
J. Edgar Hoover

## Percy Pearson Bros. Supply Company, Inc.

P. O. BOX 688

BETHESDA, ALABAMA

Phone 947-5235

Lorene Owens  
 Loxley, Ala.


DATE	INVOICE NO.	CHARGE	CREDIT	BALANCE
12.16.67	Interest		BAL. FORWARDED	133.
12.16.67	Interest	8.10		141.8
		235		149.9

I, Percy Pearson depose and say that the above amount is owing and correct that there are no off sets or counter claims or amounts owing Lorene Owens by Pearson Bros. Spl. Co., Inc.

Percy Pearson

Sworn to before me this 19th day of November, 1969

Dorothy V. Turner  
 NOTARY PUBLIC

Pay Last Amount in This Column 

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 9014

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon .....Lorene Owens

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.....

.....Lorene Owens....., Defendant.....

by .....Pearson Bros. Supply Company, Inc.

....., Plaintiff.....

Witness my hand this.....24.....day of.....Nov.....1969

.....Alice J. Duceh....., Clerk

34/  
12-12-69

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STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

PEARSON BROS. SUPPLY COMPANY,

INC.

Plaintiffs

vs.

LORENE OWENS

Defendants

SUMMONS AND COMPLAINT

FILED

Filed ..... 19.....

NOV 26 1969

Clerk

ALICE J. DUBOIS

CLERK  
RECEIVED

RICHARD C. LACEY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Nov. 26 1969

Taylor Wilkins Sheriff

I have executed this summons

this Dec. 12 1969

by leaving a copy with

Lorene Owens

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY H. F. Hall

DEPUTY SHERIFF

Taylor Wilkins Sheriff

H. F. Hall Deputy Sheriff

50 miles R. T.

R. Dale

PEARSON BROS. SUPPLY COMPANY, INC. ) IN THE CIRCUIT COURT OF  
a corporation, )  
Plaintiff, ) BALDWIN COUNTY, ALABAMA  
VS. ) AT LAW  
LORENE OWENS, ) CASE NO. 9019  
Defendant )

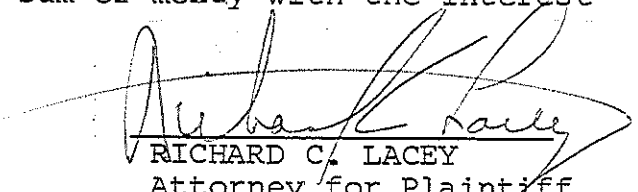
BILL OF COMPLAINT

I

The Plaintiff claims of the Defendant ONE HUNDRED FORTY-NINE and 76/100 DOLLARS (\$149.76), due from him on account, to-wit; the 31st day of October, 1969, which sum of money with the interest thereon is still unpaid.

II

The Plaintiff claims of the Defendant ONE HUNDRED FORTY-NINE and 76/100 DOLLARS (\$149.76), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit; the 31st day of October, 1969, which sum of money with the interest thereon is still unpaid.

  
RICHARD C. LACEY  
Attorney for Plaintiff

Defendant may be served at:  
Loxley, Alabama

There is attached hereto as Exhibit "A" and made a part here-  
to an itemized statement of account verified by Percy Pearson, a  
competent witness, sworn to before a Notary Public, which state-  
ment shows the amount due on this account as of the 31st day of  
October, 1969.

**FILED**

NOV 26 1969

**ALICE J. DUCK** CLERK  
REGISTER