

RICHARD C. LACEY
Attorney-At-Law
FAIRHOPE, ALABAMA 36532

January 16, 1970

Mrs. Alice J. Duck
Circuit Clerk
Circuit Court
Bay Minette, Alabama

MO. 90 83

RE: Chisenhall Agriculture Service vs. Peturis Bros.

Dear Mrs. Duck:

Please find enclosed summons and complaint in subject and place before the Sheriff for his service. Thank you.

Sincerely,

Richard C. Lacey (H)
RICHARD C. LACEY

RCL/dt
encls.

CHISENHALL AGRICULTURE SERVICE, Ø

Plaintiff, Ø

VS. Ø

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

NICK PETURIS, d/b/a PETURIS
BROTHERS, Ø

AT LAW


NO. 9083

Defendant. Ø

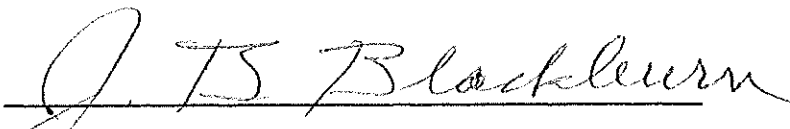
PLEAS

Now comes the defendant and for answer to the complaint
and to each and every count thereof, says:

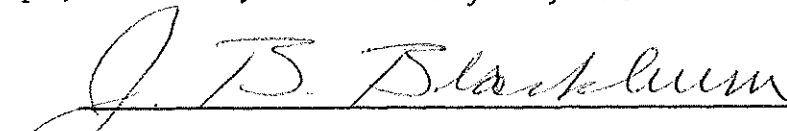
1. Not guilty.
2. The allegations of the complaint are untrue.


Attorney for Defendant

Defendant demands a trial of said
cause by jury.


Attorney for Defendant

I hereby certify that I mailed a copy of the foregoing
pleas by first class mail, properly addressed and postage prepaid,
to Richard C. Lacey, Fairhope, Alabama, on February 24, 1970.


Attorney for Defendant

CHISENHALL AGRICULTURE SERVICE, Ø

Plaintiff, Ø

VS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

NICK PETURIS, d/b/a PETURIS Ø
BROTHERS,

AT LAW

NO. 9083

Defendant. Ø

AFFIDAVIT

STATE OF ALABAMA Ø

*

BALDWIN COUNTY Ø

Before me, the undersigned authority, within and for said County in said State, personally appeared Nick Peturis, who, after being by me first duly and legally sworn, deposes and says: That he is one of the defendants in the above entitled cause; that the defendants deny, on information and belief, the entire account and that they deny liability in the above entitled cause.

Nick Peturis
Nick Peturis

Sworn to and subscribed before me on
this the 24th day of February, 1970.

Mary Lou Blackburn
Notary Public, Baldwin County, Alabama

FILED

FEB 24 1970

ALICE J. DUCK CLERK
REGISTER

jury

9083

FILED

FEB 24 1970

ALICE J. DUCK CLERK
REGISTER

CHISENHALL AGRICULTURE SERVICE,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW
NICK PETURIS, d/b/a) CASE NO. _____
PETURIS BROTHERS,)
Defendant)

TO ANY LAWFUL OFFICERS OF THE STATE OF ALABAMA, WITNESSETH:

You are hereby commanded to summons Nick Peturis to appear and plead, answer or demur to the Complaint filed in the Circuit Court of Baldwin County at Bay Minette, Alabama on the _____ day of _____, 1970 against Nick Peturis, Plaintiff by Chisenhall Agriculture Service, Plaintiff.

Done this 19 day of Jan, 1970

Wince S. Duck
CIRCUIT CLERK

CHISENHALL AGRICULTURE SERVICE,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW
NICK PETURIS, d/b/a) CASE NO. 9083
PETURIS BROTHERS,)
Defendant)

BILL OF COMPLAINT

I

Plaintiff claims of the Defendant ONE THOUSAND ONE HUNDRED FORTY-NINE and 11/100 DOLLARS (\$1,149.11), due from him on account made by Defendant on the 8th day of September, 1967 and payable September 8, 1968, which sum of money with the interest thereon is still unpaid.

II

The Plaintiff claims of the Defendant ONE THOUSAND ONE HUNDRED FORTY-NINE and 11/100 DOLLARS (\$1,149.11), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit; the 8th day of September, 1967, which sum of money with the interest thereon is still unpaid.

Richard C. Lacey
RICHARD C. LACEY
Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereto an itemized statement of account verified by G. L. Chisenhall, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 8th day of September, 1967.

Defendant may be served at Route 1, Loxley, Alabama 36551

no. 9083

Chisenhall Agriculture
Service

DS

Peturis Brothers

FILED

JAN 10 1970

ALICE J. DUCK CLERK
REGISTER

R. Lacey

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY Wick DEPUTY SHERIFF

Received 19 day of January 1970
and on 2 day of Feb. 1970
I served a copy of the within to
on Wick Pettina
By service on Angela Petris
TAYLOR WILKINS, Sheriff
BY Wick DEPUTY SHERIFF
in Bear Forest,
D.S.

CHISENHALL AGRICULTURAL SERVICE

AT OLD HARTUNG & BURMEISTER FARM

DUSTING AND SPRAYING

M

Peturis BrothersRoute 1Loxley, Ala. 36551

OFFICE PHONE WH 3-6150

P. O. Box 561

RESIDENCE PHONE WH 3-4243

9-7	312	Acres Beans	530.00
9-9	150	" " Paspray	375.00
			<u>905.00</u>

Carrying Chg. since

Jan 1968 - thro Dec. 69

244.11
<u>1149.11</u>

I, G. L. Chisenhall depose and say that the above statement is owing and correct that there are no off sets or counter claims or amounts owing Peturis Brothers by Chisenhall Agricultural Service.

A 1 % PER MONTH SERVICE CHARGE
WILL BE ADDED ON ALL PAST DUE ACCOUNTS

G. L. Chisenhall

Sworn to before me on this 16th day of January,
1970.

Donna V. Turner
NOTARY PUBLIC