

PONDER COMPANY,	)))	IN THE CIRCUIT COURT OF
	)))	
Plaintiff	)))	BALDWIN COUNTY, ALABAMA
	)))	
VS.	)))	AT LAW
	)))	
TONY DAVIS,	)))	CASE NO. 9188
	)))	
Defendant	)))	

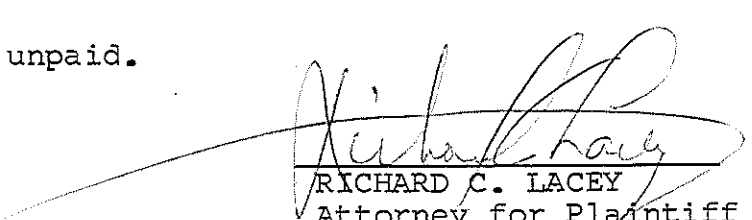
BILL OF COMPLAINT

I

The Plaintiff claims of the Defendant TWO HUNDRED FORTY-FOUR and 34/100 DOLLARS (\$244.34), due from him on account, to-wit; the 13th day of February, 1969, which sum of money with the interest thereon is still unpaid.

II

The Plaintiff claims of the Defendant TWO HUNDRED FORTY-FOUR and 34/100 DOLLARS (\$244.34), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit; the 13th day of February, 1969, which sum of money with the interest thereon is still unpaid.

  
RICHARD C. LACEY  
Attorney for Plaintiff

Defendant resides at  
Rt. 2 Box 163A2  
Silverhill Highway.  
Fairhope, Alabama

FILED

MAR 27 1970

ALICE J. DUCK CLERK  
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon TONY DAVIS

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.....

TONY DAVIS Defendant.....

by .....

.....PONDER COMPANY..... Plaintiff.....

Witness my hand this 27 day of March 1920

Alice J. Luck Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

PONDER COMPANY

Plaintiffs

vs.

TONY DAVIS

Defendants

SUMMONS AND COMPLAINT

FILED

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

MAR 27, 1970

Clerk

ALICE J. DUCK  
CLERK  
REGISTER

RICHARD C. LACEY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Fairhope, Ala.

Received In Office

March 27 1970

Taylor Wilkins Sheriff

I have executed this summons

this 23<sup>rd</sup> April 1970

by leaving a copy with

X Tony Davis

Sheriff claims 70 miles in  
Ten Cents per mile Total \$ 7.00  
TAYLOR WILKINS, Sheriff  
BY W. O. Cooper DEPUTY SHERIFF

Sheriff

W. O. Cooper Deputy Sheriff

70 miles F. Fugate, etc.

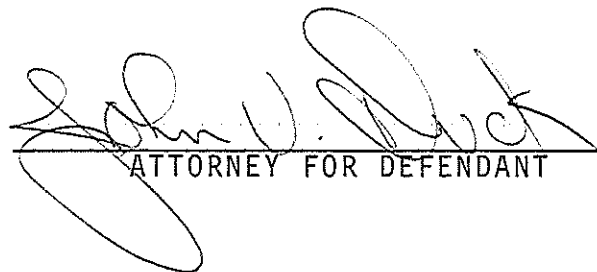
PONDER COMPANY, )  
Plaintiff, )  
vs. )  
TONY DAVIS, )  
Defendant )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW, CASE NO. 9188

DEMURRER

Comes now the Defendant in the above styled cause, and demurs to the Bill of Complaint filed herein, and for grounds thereof assigns the following separately and severally:

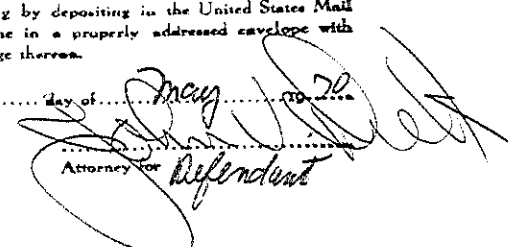
1. That said Bill of Complaint does not state a cause of action.
2. That said Bill of Complaint fails to allege what goods, merchandise or chattels were sold by the Plaintiff to the Defendant.

  
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 4 day of May 1970

  
Attorney for Defendant

FILED

MAY 5 1970

ALICE J. DUCK

CLERK  
REGISTER

244.34 - Price,

43.78 - inf

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288.32 - Total