STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Merrell Northcutt, to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the Complaint of Bonner's Aerial Applicators, Inc., a Corporation.

Witness my hand, this the day of 47

Clerk, Alice J-Duck

BONNER'S AERIAL APPLICATORS, X

INC. a Corporation,

IN THE CIRCUIT COURT OF

Plaintiff,

BALDWIN COUNTY, ALABAMA

vs.

X AT LAW

MERRELL NORTHCUTT,

X CASE NO. 92/7

Defendant.

X

1.

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED (\$500.00) DOLLARS, due by promissory note made by him on the 18th day of November, 1968, and payable one (1) year after the date of the making of the said note, with interest thereon.

That in and by the terms of said note, the Defendant agreed that if said note was placed in the hands of an Attorney for collection, that he would pay a reasonable attorney's fee, and the Plaintiff now claims the further and additional sum of ONE HUNDRED (\$100.00) DOLLARS, from the Defendant as a said reasonable attorney's fee.

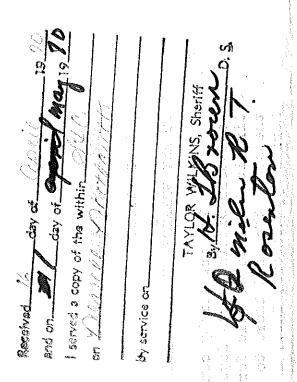
WILTERS & BRANTLEY

Defendant's address is:

Loxley, Alabama

APR 161970

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 92.1

BONNER'S AERIAL APPLICATORS, INC, a Corporation,

Plaintiff,

MERRELL NORTHCUTT,

Defendant.

SUMMONS & COMPLAINT

WILTERS & BRANTLEY Attorneys at Law Bay Minette, Alabama

APR 161970

BONNER'S AERIAL APPLICATORS, INC. a Corporation, Plaintiff, -VS- MERRELL NORTHCUTT, Defendant.	Ĭ	IN THE CIRCUIT COURT OF
	Ĭ	BALDWIN COUNTY, ALABAMA
	Ĭ	AT LAW
	Ĭ	CASE NO. 9217
	Ĭ	Ĭ
	Ŏ	

DEMURRER

Comes now the Defendant, by his attorney, Kenneth Cooper, Esquire, and demurs to the complaint heretofore filed in this cause, and as grounds therefore assigns the following, separately and severally to each and every count thereof, to-wit:

- 1. The Complaint is vague.
- 2. The complaint is uncertain.
- 3. The complaint fails to state a legal cause of action.

ATTORNEY FOR DEFENDANT

Defendant demands a trial by jury in this cause.

ATTORNEY FOR DEFENDANT

I certify that I have mailed a copy of the foregoing DEMURRER to Honorable Harry J. Wilters Jr., Bay Minette, Alabama 36507, by depositing the same in United States Mail, postage prepaid, at Bay Minette, Alabama, on this _____ day of May, 1970.

ATTORNEY FOR DEFENDANT

FEED

MAY 29 1970

AIGE I. DION CLERK REGISTER

1176

MAY 2.9 1970

LINES OF THE STATE OF STATES