

JAMES V. GRIMES d/b/a
LOXLEY PRODUCE COMPANY,

Plaintiff,

VS.

NICHOLAS PETURIS,
MICHAEL PETURIS, GEORGE
PETURIS AND MRS. JOHN
PETURIS, partners, d/b/a
PETURIS BROTHERS,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9268

COUNT I

The Plaintiff claims of the Defendants SIX HUNDRED THIRTY TWO DOLLARS (\$632.00) due from the Defendants on account stated on the 18th day of April, 1969, which sum of money together with interest thereon is still due and unpaid.

COUNT II

The Plaintiff claims of the Defendants the sum of SIX HUNDRED THIRTY TWO DOLLARS (\$632.00) due from the Defendants by account on, to-wit: April 18, 1969, which sum of money with interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is attached hereto as Exhibit "A" and made a part hereof.

WILTERS & BRANTLEY

BY: *James M. Brantley*

Attorneys for Plaintiff

FILED

MAY 25 1970

ALICE J. BUCK

CLERK
REGISTER

LOXLEY PRODUCE COMPANY

JAMES V. GRIMES

REFERENCES:

Farmers and Merchants Bank
Foley, Alabama

Produce Reporter

The Packer

GROWERS AND DEALERS IN FARM PRODUCTS

IRISH POTATOES AND SOYBEANS

LOXLEY, ALABAMA 36551

Statment
April 18, 1969

TELEPHONES:

Long Distance 964-3522 (SS)

Local 964-3532

Area Code 205

DEBIT:

April 11, 1966	100# M-45 @79¢ lb.	\$79.00
April 23, 1966	150 lbs. M-45 @79¢ lb.	\$118.50
May 9, 1966	100lbs. M-45 @ 79¢ lb.	\$79.00
June, 4 1966	450 lbs. M-45@ 79¢ lb.	\$355.50
	Total	\$632.00

CREDIT:

None

Total amount due; \$632.00

Statement of Peturis Brothers
Rt. 1, Box 89
Loxley, Alabama

STATE OF ALABAMA
BALDWIN COUNTY

Before me, James M. Brandy, a Notary Public, in and for said County and State, personally appeared James V. Grimes d/b/a Loxley Produce Company, who, being by me first duly sworn, deposes and says: That he is the owner of Loxley Produce Company; that the annexed statement of account of Loxley Produce Company against Nicholas Peturis, Michael Peturis, George Peturis and Mrs. John Peturis, partners, d/b/a Peturis Brothers, of Loxley Alabama, is just, true and correct; and that there is now due on said account the sum of SIX HUNDRED THIRTY TWO DOLLARS (\$632.00) after deducting all credits, set-offs and counter-claims.

James V. Grimes
James V. Grimes

Sworn to and subscribed before me on this the 22
day of ~~June, 1969.~~
May 1970

Sellen M Brantley
Notary Public

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 SummonNicholas Peturis, Michael Peturis, George
.....Peturis and Mrs. John Peturis, partners, d/b/a Peturis Brothers,

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 Nicholas Peturis
.....Michael Peturis, George Peturis and Mrs. John Peturis partners, d/b/a
Peturis Brothers Defendant.....

by

James V. Grimes d/b/a Loxley Produce Company....., Plaintiff.....

Witness my hand this 25 day of May 1970
Oliver J. Luck Clerk

No. 9268

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

James V. Grimes d/b/a Loxley

Loxley Produce Company
Plaintiffs

vs.
Nicholas Peturis, Michael Peturis
et al

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

MAY 25 1970

Clerk

ALICE J. DUCK
CLERK
REGISTER

Wilters & Brantley

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route 1, Box 89
Loxley, Alabama

Received In Office

May 25 19 70

Taylor Wilkins Sheriff

I have executed this summons

this July 11 19 70

by leaving a copy with

George Peturis

Nicholas 6-6-70 X

Nicholas 7-10-70

Mrs. John 6-9-70

Sheriff's fees 240 miles at 24.00

Ten Cents per mile Total \$ 24.00

TAYLOR WILKINS, Sheriff
H. B. Brown
BY DEPUTY SHERIFF

Taylor Wilkins Sheriff

H. B. Brown Deputy Sheriff

60 miles R 1

S. Field

JAMES V. GRIMES, d/b/a
LOXLEY PRODUCE COMPANY,

Plaintiff,

VS.

NICHOLAS PETURIS, MICHAEL
PETURIS, GEORGE PETURIS and
MRS. JOHN PETURIS, partners,
d/b/a PETURIS BROTHERS,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 9268

ANSWER

Now come the defendants, each separately and severally,
and for answer to Count I of the complaint say:

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

Now come the defendants, each separately and severally,
and for answer to Count II of the complaint say:

1. The account sued on is barred by the statute of limitations of three years.
2. Not guilty.
3. The allegations of the complaint are untrue.

J. B. Blackburn
Attorney for Defendants

Defendants demand a trial of
said cause by jury.

J. B. Blackburn
Attorney for Defendants

I hereby certify that a copy of the foregoing answer was
mailed by first class mail, postage prepaid and properly addressed,
to Tolbert M. Brantley, Esquire, Bay Minette, Alabama, attorney
for plaintiff, on this the 7th day of July, 1970.

FILED

JUL 1 1970

ALICE J. DUCK

CLERK
REGISTER

J. B. Blackburn
Attorney for Defendants

STATE OF ALABAMA Ø

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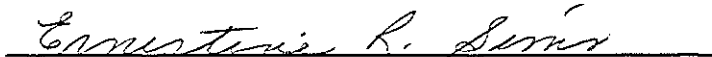
BALDWIN COUNTY Ø

Before me, the undersigned authority, in and for said County in said State, personally appeared Mrs. John Peturis, who, after being by me first duly and legally sworn, deposes and says:

That she is one of the defendants in the above entitled cause; that the defendants each deny on information and belief the correctness of the verified account filed in this cause by the plaintiff; the defendants each deny liability, and each dispute the whole account.


Mrs. John Peturis

Sworn to and subscribed before me on
this the 7th day of July, 1970.



Notary Public, Baldwin County, Alabama