

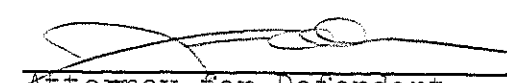
SIDNEY H. DELOACH,
Plaintiff,
VS.
J. R. McCULLOUGH,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 9379

INTERROGATORIES TO PLAINTIFF

Now comes the defendant in the above styled cause and propounds the following interrogatories to the plaintiff:

1. State what improper materials were used by the defendant as complained of by you in your complaint.
2. State what work the defendant performed for you on and after June 9, 1970, which was not in a skilled and workmanlike manner.
3. State what work the defendant negligently performed in furtherance of the oral agreement described ^{by} you entered into between the parties on June 9, 1970.
4. State what faulty workmanship the defendant has failed or refused to correct.
5. State what demands you have made of the defendant in connection with correcting any faulty workmanship complained of by you in your complaint.


Attorney for Defendant

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, personally appeared James R. Owen, who first being duly and legally sworn deposes and says: That he is the attorney for the defendant in the above styled cause. That the answers to the foregoing interrogatories if well and truly made by the plaintiff will be material evidence for the defendant at the trial of this cause.

Sworn to and subscribed before me on
this the 3rd day of August, 1970.


Notary Public, Baldwin County, Alabama

FILED

AUG 3 1970


ALICE J. DUCK CLERK
REGISTER

Admir accepted - 8/4/70
C. J. Owens

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 9379

Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause says:

- ~~Attorney for Defendant~~

AUG 3 1970

ALICE J. DUCK CLERK
REGISTER

Armes accepted 8/4/20
CZG

SIDNEY H. DELOACH	X	IN THE CIRCUIT COURT OF
Plaintiff	X	BALDWIN COUNTY, ALABAMA
-vs-	X	AT LAW
J. R. McCULLOUGH	X	CASE NO. <u>9379</u>
Defendant	X	

The plaintiff claims of the defendant \$333.69, damages for the breach of an oral agreement entered into by him on to-wit, the 9th day of june, 1970, in words and figures as follows:

The defendant agreed:

1. To paint window facings and ceilings of 5-room residence and bath, to paint outside frames of windows, cornices, gable ends of said residence, and to enamel four (4) wrought-iron posts--2 corner posts and 2 flats.
2. To paint outside of adjacent concrete-block structure, approximately 15'-27' in size with one plank wall.
3. To furnish the materials and do the work in a skilled and workmanlike manner for the sum of \$383.69.

The plaintiff says that, although he has complied with all its provisions on his part, the said defendant has failed or refused to comply with the following provisions thereof, vis:

To use proper materials and to do said work in a skilled and workmanlike manner, and, although the plaintiff has paid to the said defendant the sum of \$333.69, said defendant has failed ore refused to comply with his agreement. Said defendant negligently performed said work and labor and has failed or refused to rectify or correct the faulty workmanship in accordance with demands made of said defendant by said plaintiff.


Hence, this suit.

FILED

JUL 10 1970

ALICE J. DUCK

CLERK
REGISTER


Solicitor for Plaintiff

SUMMONS AND COMPLAINT

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 J. R. McCullough

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.....

J. R. McCullough..... Defendant.....

by

Sidney H. Deloach..... Plaintiff.....

Witness my hand this.....10th.....day of.....July.....1970.

Alice D. Luck Clerk

No. 9379

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Sidney H. Deloach

Plaintiffs

vs.

J. R. McCullough

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

JUL 10 1970

Clerk

ALICE J. DUCK

CLERK
REGISTER

C. LeNoir Thompson

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

He may be served at the City Hotel

Received In Office

July 14 1970
Taylor Wilkins Sheriff

I have executed this summons

this July 23 1970
by leaving a copy with

J. R. McCullough

Taylor Wilkins Sheriff
B. A. Belcher Deputy Sheriff