

FRED J. BOSTROM,	)	IN THE CIRCUIT COURT
	)	
Plaintiff.	)	OF BALDWIN COUNTY,
	)	
-vs-	)	ALABAMA.
	)	
REYNOLDS BOATS, INC.,	)	AT LAW.
	)	
Defendant.	)	CASE NO. <u>9415</u>

COUNT ONE

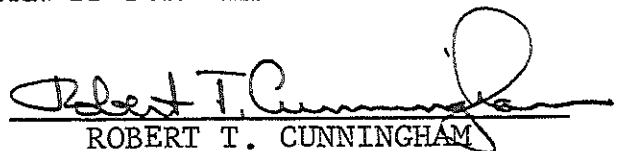
The Plaintiff claims of the Defendant the sum of TWO THOUSAND NINE HUNDRED FORTY and 46/100 (\$2,940.46) DOLLARS for money loaned by the Plaintiff to the Defendant on the 6th day of May, 1969, which sum of money with the interest thereon is still unpaid, although Plaintiff has heretofore made demand for payment.

COUNT TWO

The Plaintiff claims of the Defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS for money loaned by the Plaintiff to the Defendant on the 14th day of May, 1969, which sum of money with the interest thereon is still unpaid, although Plaintiff has heretofore made demand for payment.

CUNNINGHAM, BOUNDS & BYRD  
ATTORNEYS FOR PLAINTIFF

BY:

  
ROBERT T. CUNNINGHAM

Address of Defendant:

Reynolds Boats, Inc.  
831 North Section Street  
Fairhope, Alabama

**FILED**

JUL 3 0 1970

ALICE J. DUCK CLERK  
REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9405

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ~~FRED J. BOSTROM~~ REYNOLDS BOATS, INC.

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.....

REYNOLDS BOATS, INC. .... Defendant.....

by ..... FRED J. BOSTROM.....

Plaintiff.....

Witness my hand this..... 30th..... day of..... July..... 19 70.....

Alice J. Duck, Clerk

287-8-6-70

No. 9405.....

Page.....

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

FRED J. BOSTROM

Plaintiffs

vs.

REYNOLDS BOATS, INC.

Defendants

**SUMMONS AND COMPLAINT**

Filed July 30, 1970

Alice J. Duck Clerk

Cunningham, Bounds & Byrd

P.O. Box 4486  
Mobile

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

July 31 1970  
Taylor Wilkins Sheriff

I have executed this summons

this 6<sup>th</sup> Aug. 1970  
by leaving a copy with

Reynolds Boat Works

Sheriff claims 70 miles at  
Ten Cents per mile totals \$7.00  
TAYLOR WILKINS Sheriff  
W. A. Clark  
DEPUTY SHERIFF

Sheriff

W. A. Clark

Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

no miles

FRED J. BOSTROM,	)	
	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
	)	
vs.	)	AT LAW
	)	
REYNOLDS BOATS, Inc.,	)	CASE NO. 9405
	)	
Defendant	)	

DEMURRER

COMES NOW THE DEFENDANT IN THE ABOVE STYLED CAUSE, REYNOLDS BOATS, INC., AN ALABAMA CORPORATION, AND DEMURS TO THE PLAINTIFF'S COMPLAINT AND EACH COUNT THEREOF, SEPARATELY AND SEVERALLY, AND ASSIGNS THE FOLLOWING SEPARATE AND SEVERAL GROUNDS OF DEMURRER.

1. Said count is vague and indefinite.
2. Said count is so vague and indefinite as to fail to inform this Defendant of what it is called upon to defend.



Daniel A. Benton  
P. O. Box 471  
Fairhope, Alabama  
Attorney for Defendant

DEFENDANT DEMANDS A TRIAL BY JURY OF THIS CAUSE.



Daniel A. Benton  
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 26<sup>th</sup> day of August, 1970 served a copy of the foregoing on ROBERT T. CUNNINGHAM of the firm of CUNNINGHAM, BOUNDS, & BYRD by mailing the same by U. S. Mail, properly addressed and with First Class Postage Prepaid.

  
DANIEL A. BENTON

**FILED**

AUG 27 1970

ALICE J. DUCK    CLERK  
REGISTER

**FILED**

AUG 27 1970

**ALICE J. DUCK** CLERK  
REGISTER