

WILSON HAYES
LAWYER

P. O. BOX 300
BAY MINETTE, ALABAMA
36507

TELEPHONE 937-5506

November 11, 1970

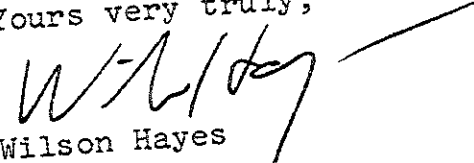
Clerk, Circuit Court
Baldwin County
Bay Minette, Alabama 36507

Dear Mrs. Duck:

Please file the enclosed suit entitled E. G.
Small d/b/a E. G. Small Agency Vs. Harley Douglas Orem,
Jr.

With kind regards, I am

Yours very truly,


Wilson Hayes

WH/ms
Enc.

9554

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Harley Douglas Orem, Jr. 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 same, then and there to answer the complaint of E. G. Small d/b/a E. G. Small Agency.

Witness my hand, this the 14 day of Nov, 1970.

Defendant may be served:
1809 Hand Ave.
Bay Minette, Alabama

Alice J. Duck
Clerk

E. G. SMALL d/b/a E. G.
SMALL AGENCY,

I IN THE CIRCUIT COURT OF

Plaintiff,

I BALDWIN COUNTY, ALABAMA

Vs.

I AT LAW

HARLEY DOUGLAS OREM, JR.

I

Defendant.

I NUMBER: 9554

I

The Plaintiff claims of the Defendant the sum of One Hundred Sixty-five and 32/100 (\$165.32) Dollars due from him by account on the 31st day of August, 1970 which sum of money with interest thereon, is still unpaid.

II

Plaintiff files by verified itemized statement of account, which statement is attached hereto.

W. H. Hayes
Attorney for Plaintiff
Wilson Hayes

FILED

NOV 14 1970

ALICE J. DUCK CLERK
REGISTER

NUMBER: _____

E. G. Small d/b/a E. G.
Small Agency,

Plaintiff,

Vs.

Harley Douglas Orem, Jr.

Defendant.

In the Circuit Court of
Baldwin County, Alabama
At Law


Defendant may be served:

1809 Hand Avenue
Bay Minette, Alabama

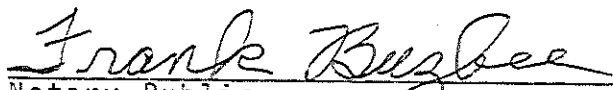
STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority appeared E. G. Small, who being known to me and being duly sworn, deposes and says that he is the Owner of E. G. Small Agency and that he is familiar with the books and business of the said E. G. Small Agency and that the attached account with Harley Douglas Orem, Jr. of 1809 Hand Avenue, Bay Minette, Alabama is just and correct, within the knowledge of this affiant and that the items thereon stated composing the said account are true and correct and that credit has been given for all payments and just and lawful offsets to which the said Harley Douglas Orem, Jr. is entitled and that the balance thereof, amounting to the sum of \$165.32 with interest thereon from the 31st day of August, 1970 is justly due and remains unpaid.


Affiant

Sworn to and subscribed before me this the 27th day
of Oct, 1970.


Notary Public

My Commission Expires January 26, 1974

AT 88-135

SMALL AGENCY

YOUR PROTECTION IS MY BUSINESS

P.O. Box 205
 Bay Minette, Ala
 P.O. Box 147
 Spanish Fort, Ala

Mr. Harley Douglas Orem, Jr.
 1809 Home Avenue
 Bay Minette, Alabama 36507

DATE 7-1-70

PROPERTY INSURED		MORTGAGEE:		
DATE ISSUED	TO EXPIRE	COMPANY AND POLICY NUMBER	COVERAGE-AMOUNT OR LIMITS	PREMIUM
7-15-70	7-15-71	Southeastern Fidelity #00-011255	Financed (Down)	\$162.00
7-7-70		S. G. ACF 261279	Cancelled Return	\$29.83
8-17-70	7-15-70	Endorsement adding for Violations		
		Pol. #00-011255	\$246.00	378.17
8-21-70		Southeastern Fidelity cancelled		
		Pol. #00-011255. return	\$212.85	165.32

IMPORTANT: Please examine the policies listed above and notify immediately if any changes or corrections are necessary. Any policy not wanted must be returned promptly for cancellation; otherwise an earned premium will be charged by the Company for the time it was in force. Premiums are due when policies are received.

Handwritten signature

9554

E. G. Small, d/b/a
E. G. Small Agency

vs.

Harley Douglas Brem,
Jr.

Received 14 day of Nov 1970
and on 14 day of Dec 1970
I served a copy of the within 2 + 0
on Harley D. Brem Jr.

By service on _____

JAYCE GILLES, Clerk
W. H. Hayes, Jr., S.

FILED

NOV 14 1970

ALICE J. DUCK CLERK
REGISTER

W. Hayes

E. G. SMALL, d/b/a
E. G. SMALL AGENCY,

Plaintiff

-VS-

HARLEY DOUGLAS OREM, JR.,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

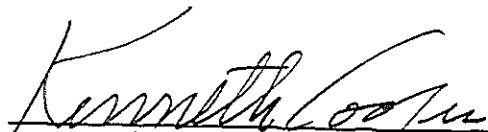
AT LAW

CASE NO. 9554

DEMURRER

Comes now the Defendant in above styled cause and demurs to the complaint heretofore filed in this cause and assigns as grounds therefor the following separately and severally to each and every count thereof:

1. The complaint does not state a legal cause of action.
2. The complaint is vague.


ATTORNEY FOR DEFENDANT

Defendant demands a trial
by jury in this cause.


ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Demurrer to Honorable Wilson Hayes by personally leaving a copy of same at his law office in Bay Minette, Alabama, this 13th day of January, 1971.


ATTORNEY FOR DEFENDANT

FILED

JAN 13 1971

ALICE J. DUCK CLERK
REGISTER

E. G. SMALL, d/b/a
E. G. SMALL AGENCY,

Plaintiff

-VS-

HARLEY DOUGLAS OREM, JR.

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9,554

ANSWER

Comes now the defendant in above-styled cause and for answer
to the complaint saith:

1. General issue.
2. Not guilty.

Kenneth Cooper
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing answer
upon Honorable Wilson Hayes by handing a copy of same to him in
Bay Minette, Alabama, on this fourteenth day of December, 1971.

Kenneth Cooper
ATTORNEY FOR DEFENDANT

Filed 12-14-71

Ernie B. Blackmon
Circuit Clerk