

JOHN P. BEEBE
ATTORNEY AT LAW
ROBERTSDALE, ALABAMA

February 3rd, 1971

Mrs. Eunice M. Balckman, Clerk,
Circuit Court, Baldwin County,
Bay Minette, Alabama.

Dear Mrs. Blackman:

Re: Bertolla Farm Supply Company,

vs

Harry Linden and Sam Styron, doing
business as Gulf Flying Service

Two-Cases

I enclose original and copy of summon and complaint in
each case with the request that they be filed and placed in the
hands of the Sheriff for service.

Harry Linden lives in Silverhill and
Sam Styron lives in or around Foley.

Yours very truly,

John P. Beebe

CECIL G. CHASON

Attorney at Law

THOMAS W. UNDERWOOD, JR.
ASSOCIATE

P. O. DRAWER 458
216 W. LAUREL AVENUE
FOLEY, ALABAMA 36535
PHONE 205/943-3171

March 15, 1971

Mrs. Eunice B. Blackmon
Clerk of Court
Bay Minette, Alabama

Re: Bertolla Farm Supply Company, Inc.
vs. Sam Styron, d/b/a Gulf Flying
Service. Case No. 9666

Dear Mrs. Blackmon:

Enclosed are original and copy of Plea in Abatement in
the above styled cause.

Yours very truly,


C. G. Chason

CGC:jc
Encl.

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon SAM STYRON, doing business as Gulf Flying Service, 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 BERTOLLA FARM SUPPLY COMPANY, INC., a corporation.

WITNESS my hand this the 4 day of February, 1971.

Eunice B. Blackmon
Clerk

BERTOLLA FARM SUPPLY COMPANY, INC.,)
a corporation,)
Plaintiff,)

vs

SAM STYRON, doing business as)
Gulf Flying Service,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

No. 9666

COUNT ONE

The Plaintiff claims of the Defendant the sum of TWO THOUSAND THREE HUNDRED EIGHTY NINE & 16/100 (\$2,389.16) DOLLARS, due from him by account on the 6th day of January, 1971, which sum of money, with interest thereon, is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant the sum of TWO THOUSAND THREE HUNDRED EIGHTY NINE & 16/100 (\$2,389.16) DOLLARS, due from him on account stated between the Plaintiff and Defendant on the 6th day of January, 1971, which sum of money, with interest thereon, is still unpaid.

COUNT THREE

The Plaintiff claims of the Defendant the sum of TWO THOUSAND THREE HUNDRED EIGHTY NINE & 16/100 (\$2,389.16) DOLLARS, for merchandise, goods and chattels sold by the Plaintiff to the Defendant on September 7th, 8th and 8th, 1970, which sum of money, with interest thereon, is still unpaid.

FILED

FEB 4 1971

John P. Beebe
Attorney for the Plaintiff

EUNICE B. BLACKMON CIRCUIT CLERK

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24-2-12-71

9666

Bertolla Farm
Supply Co. Inc.
a corp. Pbz

vs.
Sam Styron dba
Gulf Flying Service

FILED

FEB 4 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

John P. Beebe, Atty

Received 4 day of April 19 71
and on 12 day of Sept 19 71
I served a copy of the within 84C
on Sam Styron
By service on _____

Sheriff's Office 77 miles at
Total \$ 7.20
TAYLOR WILKINS, Sheriff
of Mississippi
DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff

[Signature] B.R.

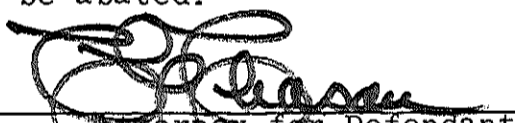
BERTOLLA FARM SUPPLY COMPANY, INC.,))	
a corporation,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	
)	BALDWIN COUNTY, ALABAMA
vs.)	
)	AT LAW
SAM STYRON, doing business as)	
Gulf Flying Service,)	
)	CASE NO. 9666
Defendant.)	

PLEA IN ABATEMENT

Comes Sam Styron, the Defendant in the above styled cause and appearing specially and solely for the purpose of filing this plea, shows unto this Honorable Court as follows:

That he is not doing business as Gulf Flying Service, but that Gulf Flying Service is a corporation organized and existing under the laws of the State of Alabama and that all of the dealings and transactions with Bertolla Farm Supply Company, Inc., a corporation, were done by and through Gulf Flying Service, Inc., a corporation.

The said Sam Styron therefore prays this Honorable Court that the cause now pending wherein Bertolla Farm Supply Company, Inc., a corporation, is plaintiff, and Sam Styron, doing business as Gulf Flying Service, defendant, be abated.

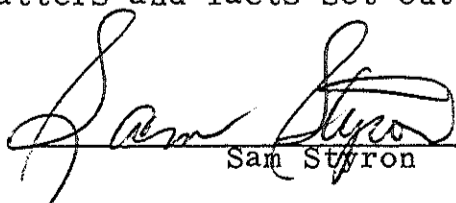


Attorney for Defendant

STATE OF ALABAMA


BALDWIN COUNTY

Before me, Janice L. Childress, a Notary Public in and for said County in said State, personally appeared Sam Styron, who is known to me and who, after being by me first duly and legally sworn, deposes and says that the matters and facts set out in the foregoing plea are true.



Sam Styron

Sworn to and subscribed before me on this 15th day of March, 1971.



Notary Public, Baldwin County
State of Alabama

C. G. C.

FILED

MAR 16 1971

EUNICE B. BLACKMON CIRCUIT CLERK