

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. H. DEVINE, 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 ROSWELL R. EASTER.

Witness my hand, this the 8 day of February, 1971.

Eunice B. Blackmon
Clerk

ROSWELL R. EASTER,
Plaintiff,
vs

J. H. DEVINE,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW No. 9675

COUNT ONE

The Plaintiff claims of the Defendant the sum of THREE HUNDRED NINETY TWO & 19/100 (\$392.19) DOLLARS, due from him by account on, to-wit: July, 1969, which sum of money, with interest thereon, is still unpaid.

COUNT TWO

The plaintiff claims of the defendant the sum of THREE HUNDRED NINETY TWO & 19/100 (\$392.19) DOLLARS, for merchandise, goods and chattels sold by the plaintiff to the defendant during the month of July, 1969, which sum of money, with interest thereon, is still unpaid.

John P. Beebe
Attorney for the Plaintiff

FILED

FEB 8 1971

EUNICE B. BLACKMON
CIRCUIT CLERK

9675

Roswell R. Easter

vs.

J. H. Levine
Lafayette

FILED

FEB 8 1971

EUNICE B. BLACKMON
CIRCUIT CLERK

John P. Beebe

Sheriff claims 40 miles at
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
BY Brown
DEPUTY SHERIFF

Received 9 day of Feb 1971
and on 13 day of Feb 1971
I served a copy of the within SCC
on J. H. Levine

FILED

FEB 8 1971

EUNICE B. BLACKMON
CIRCUIT CLERK

TAYLOR WILKINS, Sheriff
By H. Brown D.S.
40 mi RT
Lafayette

ROSWELL R. EASTER,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	
vs.	X	BALDWIN COUNTY, ALABAMA
J. H. DEVINE,	X	AT LAW NO. <u>9675</u>
Defendant.	X	

PLEA

Comes now the Defendant in the above styled cause and for Plea to the Complaint heretofore filed against him, says separately and severally as follows:

1. The allegations of the Complaint are untrue.

CHASON, STONE & CHASON

BY: John E. Chason
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 12 day of March, 1971

John E. Chason

FILED

MAR 12 1971

EUNICE B. BLACKMON CIRCUIT CLERK

JOHN P. BEEBE
ATTORNEY AT LAW
ROBERTSDALE, ALABAMA

February 5, 1971

Mrs. Eunice N. Blackmon,
Clerk, Circuit Court,
Baldwin County,
Bay Minette, Alabama.

9675

Dear Mrs. Blackmon:

I enclose original and one copy of summon and complaint
in the matter of Roswell R. Easter, vs. J. H. Devine, defendant,
who lives in Loxley, Alabama.

Please file the same and have the Sheriff serve the Def-
endant.

Thanks, I am

Yours very truly,

John P. Beebe