

LEWIS Y. HUGHES, d/b/a/
HUGHES GROCERY & SERVICE STATION,

Plaintiff;

Vs.

H. B. CLEVELAND and
MAGNOLIA MILL & MANUFACTURING
COMPANY, INC., jointly and ind.,

Defendants

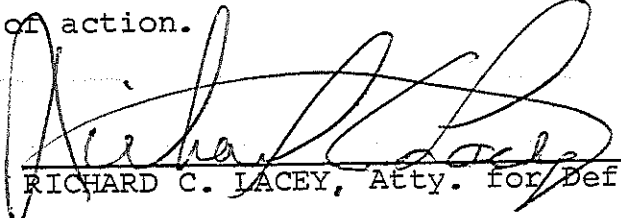
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9797

Comes now the Defendant in the above styled cause,
and demurs to said Bill of Complaint in each and every count
thereof, as follows:

1. The Complaint fails to state a cause of action.
2. The Complaint is multifarious.
3. The Complaint fails to allege sufficient facts
to state a cause of action.

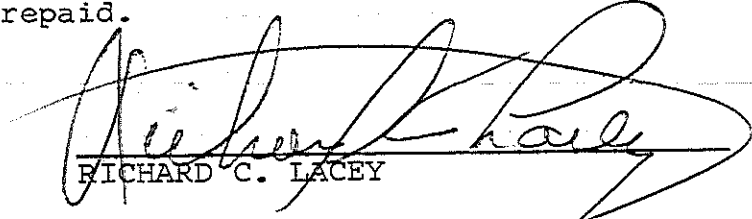

RICHARD C. LACEY, Atty. for Def.

The Defendant respectfully demands a trial by jury.


RICHARD C. LACEY, Atty. for Def.

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 5 day of
May, 1971, served a copy of the foregoing on Taylor
Wilkins, Jr., Attorney at Law, Bay Minette, Alabama, by mail-
ing the same by United States Mail, properly addressed, and
first-class postage prepaid.


RICHARD C. LACEY

FILED

MAY 10 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

LEWIS Y. HUGHES, d/b/a HUGHES
GROCERY & SERVICE STATION

PLAINTIFF

VS

H. B. CLEVELAND and MAGNOLIA
MILL & MANUFACTURING COMPANY,
INC., jointly and individually,

DEFENDANTS

X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA

X AT LAW

X

X

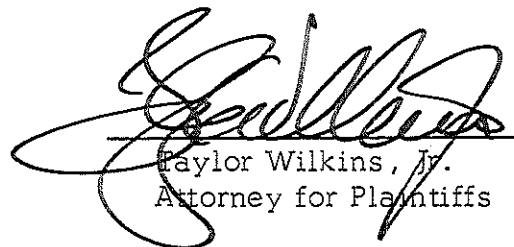
X

X

CASE NO: 9797

AMENDMENT

Comes now the Plaintiff, Lewis Hughes, in the above styled cause, and amends his bill of complaint heretofore filed, by adding as a party Plaintiff, Sam Ard, so the style of this case on behalf of the Plaintiff shall be, Lewis Y. Hughes, d/b/a Hughes Grocery & Service Station, and Sam Ard, as Plaintiffs, versus H. B. Cleveland and Magnolia Mill and Manufacturing Company, Inc., jointly and individually, Defendants. The Plaintiffs hereby ratify, confirm and adopt all other allegations as set forth in the bill of complaint.


Taylor Wilkins, Jr.
Attorney for Plaintiffs

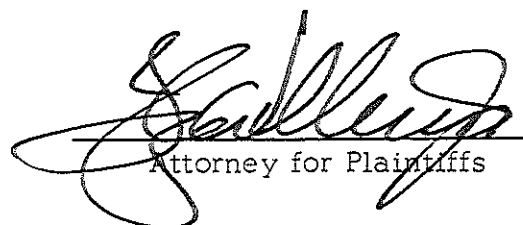
I, the undersigned, Taylor Wilkins, Jr., do hereby certify that I have on this the 14th day of July, 1972, forwarded a true and exact copy of the foregoing amendment to Mr. Richard C. Lacey, Attorney at Law, Fairhope, Alabama, attorney of record for the Defendants, by mailing the same in the United States Post Office, properly addressed, with the postage paid thereon.

DONE this the 14th day of July, 1972.

FILED

JUL 14 1972

EUNICE B. BLACKMON CIRCUIT
CLERK


Attorney for Plaintiffs

LEWIS Y. HUGHES, d/b/a
Hughes Grocery & Service Station

PLAINTIFF

VS

H. B. CLEVELAND and
MAGNOLIA MILL & MAUFACTURING
COMPANY, jointly and individually

DEFENDANTS

X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA

X AT LAW

X 9797

X

X

X

COUNT I.

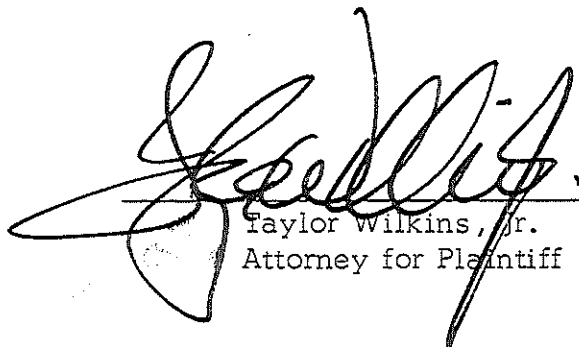
The Plaintiff claims of the Defendants, THIRTY (\$30.00) DOLLARS due by check, dated January 29, 1970, endorsed to the Plaintiff, and drawn by the Defendant on the Merchants National Bank, Mobile, Alabama, which check has been returned marked "Insufficient Funds", together with interest thereon.

COUNT II.

~~The Plaintiff claims of the Defendants ONE THOUSAND SIX HUND-~~
~~RED FORTY-FIVE AND 84/100 (\$1,645.84) DOLLARS, due from him by account~~
~~on, to-wit, the 15th day of October, 1970, which sum of money, with interest~~
~~thereon, is still unpaid.~~

COUNT III.

The Plaintiff claims of the Defendants ONE THOUSAND SIX HUND-
RED FORTY-FIVE AND 84/100 (\$1,645.84) DOLLARS, due from him for merchandise
sold by the Plaintiff to the Defendants on, to-wit, the 15 day of October, 1970,
which sum of money, with interest thereon, is still unpaid.


Taylor Wilkins, Jr.
Attorney for Plaintiff

FILED

APR 14 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

IN THE CIRCUIT COURT OF

SALTDWY COUNTY, ALABAMA

AS TAX

7777

X

X

X

X

X

X

X

LEWIS Y. HUGHES, c/o/a
Hughes Grocery & Service Station

PLAINIFF

vs

H. B. CLEVELAND and
MAGNOLIA MILK & ICE FACTORY
COMPANY, jointly and individually

DEFENDANTS

COUNT I.

The Plaintiff claims of the Defendants, THIRTY (\$30.00) DOLLARS

due by check, dated January 22, 1978, endorsed to the Plaintiff, and drawn by
the Defendant on the Merchants National Bank, Mobile, Alabama, which check
has been returned marked "Insufficient Funds", together with interest thereon.

COUNT II.

The Plaintiff claims of the Defendants, ONE THOUSAND SIX HUND-

RED FORTY-FIVE AND 50/100 (\$1,645.50) DOLLARS, due from him by account

number 1234, which sum of money, together with interest

*We, the jury find for the Pl. and
against the Defendant and assess
the damages at \$1330.00.*

The Plaintiff claims of the Defendants, ONE THOUSAND SIX HUND-

RED FORTY-FIVE AND 50/100 (\$1,645.50) DOLLARS, due from him by account

number 1234, which sum of money, together with interest

*Jack D. Stapleton
Foreman*

Attorney for Plaintiff

FILED

JAN 24 1978

CLERK OF COURT

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9797

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon H. B. CLEVELAND

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.....

H. B. Cleveland & Magnolia Mill & Manufacturing Company....., Defendant.....

by Lewis Y. Hughes, dba Hughes Grocery & Service Station

....., Plaintiff.....

Witness my hand this 14th day of April 19.71.

Eunice B. Blackmon Clerk

No. 9797

Page.....

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

LEWIS Y. HUGHES, dba

Hughes Grocery & Service Sta.
Plaintiffs

vs.

H. B. CLEVELAND and
MAGNOLIA MILL & MFG. CO.
Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

Clerk

APR 14 1971

EUNICE B. BLACKMON CIRCUIT CLERK

Taylor Wilkins, Jr.
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Magnolia Springs, Alabama

Received In Office

April 15 1971

Taylor Wilkins Sheriff

I have executed this summons

this 4-19 1971

by leaving a copy with cll

H. B. Cleveland

Sheriff claims 90 miles at

Ten Cents per mile Total \$9.00

Taylor Wilkins, Sheriff

RM Deputy Sheriff

Taylor Wilkins Sheriff

Deputy Sheriff

TAYLOR D. WILKINS, JR.

ATTORNEY AT LAW

P. O. Box 546 Court House Square
Telephone 937-7024
BAY MINETTE, ALABAMA 36507

July 31, 1972

Mrs. Eunice B. Blackmon
Circuit Clerk
Baldwin County Court House
Bay Minette, Alabama 36507

RE: Hughes vs Cleveland
Case No. 9797


Dear Eunice:

In reference to the above case, I have made a settlement
on the judgement with Dick Lacey.

I would appreciate you forwarding him a copy of the cost
bill.

Thanking you for your cooperation and with kindest regards,
I am

Very truly yours,



Taylor Wilkins, Jr.

TWJr:sp