

ALTON B. GRIMES, individually
and d/b/a GRIMES INDUSTRIES,

Plaintiff

-VS-

JOHN M. HASTIE,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9,908

DEMURRER

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

1. The complaint is vague.
2. The complaint is uncertain.
3. The complaint does not state a legal cause of action.
4. The complaint fails to state when the interest on the amount sued for begins to run.

Kenneth Soja
ATTORNEY FOR DEFENDANT

CERTIFICATE OF MAILING

I certify that I have mailed a copy of the foregoing Demurrer to Honorable J. Connor Owens, Jr., Dahlberg Building, Bay Minette, Alabama 36507, by depositing the same in the United States Mail, postage prepaid, at Bay Minette, Alabama, on this 29 day of July, 1971.

Kenneth Soja
ATTORNEY FOR DEFENDANT

~~FILED~~
~~JUL 30 1971~~
~~CLERK~~
FILED

JUL 30 1971

EUNICE B. BLACKMON CIRCUIT CLERK

ALTON B. GRIMES, individually
and d/b/a GRIMES INDUSTRIES,

Plaintiff,

vs.

JOHN M. HASTIE,

Defendant.

)
)
) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

)
) AT LAW.

)
) 9908

COUNT ONE:

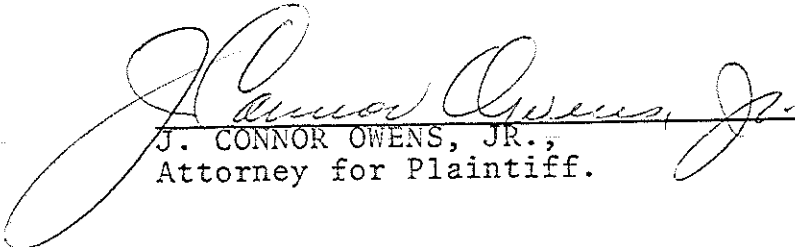
The Plaintiff claims of the Defendant, the sum of ONE THOUSAND EIGHT AND 17/100 DOLLARS (\$1,008.17), with the interest thereon, the balance due by account by and between the Plaintiff and the Defendant on March 1, 1970, which sum of money, with the interest thereon, is still due and unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant, the sum of ONE THOUSAND EIGHT AND 17/100 DOLLARS (\$1,008.17), with the interest thereon, the balance due by account by and between the Plaintiff and the Defendant on March 1, 1970, which sum of money, with the interest thereon, is still due and unpaid.

COUNT THREE:

The Plaintiff claims of the Defendant, the sum of ONE THOUSAND EIGHT AND 17/100 DOLLARS (\$1,008.17), due from the Defendant for work and labor performed and materials furnished by the Plaintiff to the Defendant, on, to-wit, from July 30, 1969, through August 4, 1969, which sum of money, with the interest thereon, is still due and unpaid.


J. CONNOR OWENS, JR.,
Attorney for Plaintiff.

FILED

JUL 2 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9908

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOHN M. HASTIE

..... STOCKTON, ALABAMA

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.....

JOHN M. HASTIE

....., Defendant.....

by ALTON B. GRIMES, individually and d/b/a GRIMES INDUSTRIES

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

Witness my hand this 22nd day of July 1971

Ernie B. Black Clerk

No. 9988

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

ALTON B. GRIMES, individually
and d/b/a GRIMES INDUSTRIES,

Plaintiffs

vs.

JOHN M. HASTIE

Defendants

SUMMONS AND COMPLAINT

Filed JUL 1 1971

JUL 2 1971 Clerk

EUNICE B. BLACKMON CIRCUIT
CLERK

J. CONNOR OWENS, JR.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

STOCKTON, ALABAMA

Received In Office

July 6 1971

Taylor Wilkins Sheriff

I have executed this summons

this July 7 1971

by leaving a copy with

John M. Hastie

Sheriff claims 22 miles at

Ten Cents per mile Total \$ 2.20.

TAYLOR WILKINS, Sheriff

BY W. A. Solbert
DEPUTY SHERIFF

Taylor Wilkins Sheriff
W. A. Solbert Deputy Sheriff

Monroe Printing Co. Bay Minette, Ala.

Stockton

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

DAHLBERG BUILDING

P. O. BOX 729

BAY MINETTE, ALABAMA 36507

November 5, 1971

TELEPHONE NO. 937-4661

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

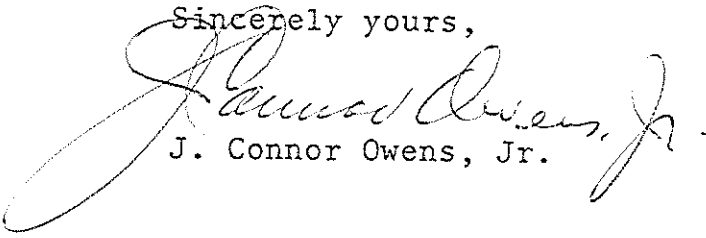
Subject: Alton B. Grimes, individually & d/b/a Grimes
Industries vs. John M. Hastie; Law Case #9908

Dear Eunice:

I am enclosing herewith check in the amount of
\$30.70 covering the court costs due in the above styled
case, and request that this case be dismissed.

Thank you for your consideration in this matter.

Sincerely yours,


J. Connor Owens, Jr.

JCO:am
Encl: 1

CC: Mr. Kenneth Cooper
Attorney at Law
Bay Minette, Alabama