

BUILDERS TRANSPORTS, INC.,	)	
a Corporation,	)	IN THE CIRCUIT COURT OF
Plaintiff	)	
vs.	)	BALDWIN COUNTY, ALABAMA
	)	AT LAW
E. DOUGLAS WHITE,	)	
Defendant.	)	CASE NO. <u>9951</u>

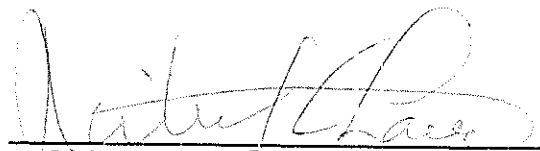
BILL OF COMPLAINT

I

The Plaintiff claims of the Defendant the sum of ONE HUNDRED TWO AND 69/100 DOLLARS (\$102.69), due from him on account, to-wit; the 15th day of November, 1970, which sum of money with the interest thereon, is still unpaid.

II

The Plaintiff claims of the Defendant the sum of ONE HUNDRED TWO AND 69/100 DOLLARS (\$102.69), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit; the 15th day of November, 1970, which sum of money with interest thereon is still unpaid.


Attorneys for Plaintiff

The Defendant may be served at Rte. 1, Summerdale, Alabama.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.

9951

TERM,

19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon E. Douglas White

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.....

E. DOUGLAS WHITE .., Defendant.....

by BUILDERS TRANSPORTS, INC., a corporation,

Plaintiff.....

Witness my hand this 28 day of July 1921

Eunice B. Blackmon
Clerk

No. 9951

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

BUILDERS TRANSPORTS, INC.,

a Corporation,

Plaintiffs

vs.

E. DOUGLAS WHITE

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

Clerk

JUL 28 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

JUL 28 1971

TAYLOR WILKINS
SHERIFF

Richard C. Lacey
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Recieved In Office

July 28 1971

Sheriff

I have executed this summons

this July 28 1971
by leaving a copy with

E. Douglas White

Sheriff claims 60 miles or

Ten Cents per mile Total \$ 6.00

TAYLOR WILKINS Sheriff

BY H. J. Brown
DEPUTY SHERIFF

Taylor Wilkins Sheriff

H. J. Brown Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

Com R T
S. R. La

BUILDERS TRANSPORTS, INC.,
a corporation,

PLAINTIFF

VS

E. DOUGLAS WHITE

DEFENDANT

X

X

X

X

X

X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

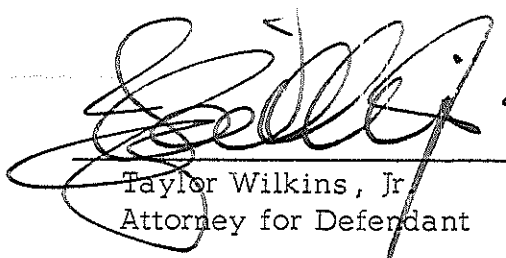
AT LAW

CASE NO: 9951

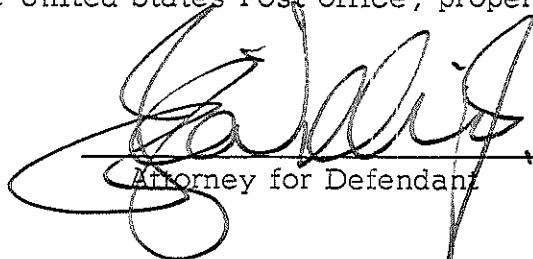
DEMURRER

Comes now the Defendant, E. Douglas White, in the above styled cause, and files this demurrer to each and every count thereof in the Plaintiff's complaint and sets down and assigns the following grounds separately and severally:

1. Defendant alleges that Plaintiff has failed to state a cause of action in said bill of complaint.


Taylor Wilkins, Jr.
Attorney for Defendant

I, the undersigned, Taylor Wilkins, Jr., do hereby certify that I have on this the 18th day of August, 1971, forwarded a true and exact copy of the foregoing demurrer to Mr. Richard C. Lacey, 221 Fairhope Avenue, Fairhope, Alabama, by mailing the same in the United States Post office, properly addressed with the postage paid thereon.


Attorney for Defendant

FILED

AUG 19 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

RICHARD C. LACEY

Attorney-At-Law

P. O. DRAWER A-J

FAIRHOPE, ALABAMA 36532

TELEPHONE 928-2373

July 27, 1971

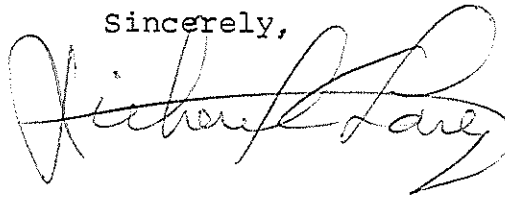
Mrs. Eunice Blackmon
Clerk, Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama 36507

Re: Builders Transports, Inc., a Corporation,
Plaintiff, vs. E. Douglas White, Defendant.

Dear Eunice:

Please have subject Defendant served.

Sincerely,



9951

on account

RCLacey
mr
Enclosures

FILED

JUL 28 1971

EUNICE B. BLACKMON CIRCUIT
CLERK