

CHARLES D. SANKS,
individually and d/b/a
SANKS CONSTRUCTION
COMPANY,

Plaintiff,

vs.

CHARLES KERBY,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 10,285

COMPLAINT

COUNT ONE

The Plaintiff claims of the Defendant the sum of One Hundred Sixty-seven and 47/100 Dollars (\$167.47) due from him by account on, to-wit: the 1st day of September, 1971, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO

~~The Plaintiff claims of the Defendant the sum of One~~
Hundred Sixty-seven and 47/100 Dollars (\$167.47) for work and labor done by the Plaintiff for the Defendant, on, to-wit: the 1st day of September, 1971, at his request, which sum of money, with the interest thereon is still unpaid.

E.E. Ball

E.E. BALL,
Attorney for Plaintiff

Defendant may be served
at 110 Quinley, Bay Minette,
Alabama.

FILED

MAR 13 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND COMPLAINT

MOORE PRINTING CO. BAY MINETTE ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonCHARLES KERBY.....

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.....

.....CHARLES KERBY..... Defendant.....

byCHARLES D. SANKS, individually and d/b/a SANKS CONSTRUCTION.....

.....COMPANY..... Plaintiff.....

witness my hand this 13 day ofMarch..... 1972.

Eunice B. Blackmon Clerk

No. 10,285

Page.....

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

CHARLES D. SANKS, ind. and

d/b/a SANKS CONSTRUCTION CO.
Plaintiffs

VS.

CHARLES KERBY

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

Clerk

MAR 13 1972

EUNICE B. BLACKMON
CIRCUIT CLERK

MAR 13 1972

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

March 13 1972
Taylor Wilkins Sheriff

I have executed this summons

this March 15 1972

by leaving a copy with

Charles Kerby

Sheriff claims miles at

Ten Cents per mile Total \$

TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF

Taylor Wilkins Sheriff
W. G. Zeller Deputy Sheriff

CHARLES D. SANKS,
individually and d/b/a
SANKS CONSTRUCTION
COMPANY,

Plaintiff

VS

CHARLES KERBY

Defendant

* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA
* AT LAW
* CASE NO. 10,285
*
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Comes the Defendant in the above styled cause and
demurs to the complaint filed in said cause and to each
court thereof as follows:

1. Count one of said complaint fails to allege a
cause of action.

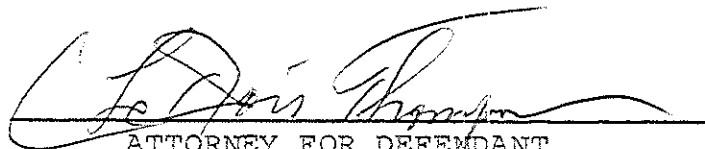
2. Count two of said complaint fails to allege that
said work and labor was done in a skilled and workmanlike
manner.


ATTORNEY FOR DEFENDANT

Defendant respectfully demands trial by jury.


ATTORNEY FOR DEFENDANT

I hereby certify that I have this the 28th day of March, 1972
served a copy of the foregoing demurrer on Honorable E. E. Ball,
Attorney at Law, Bay Minette, Alabama, Attorney for Plaintiff,
by placing a copy in the U. S. mail, post-age pre-paid.


ATTORNEY FOR DEFENDANT

FILED

MAR 28 1972

EUNICE B. BLACKMON CIRCUIT
CLERK