

JERRY R. WALKER	Ø	IN THE CIRCUIT COURT OF
PLAINTIFF	Ø	BALDWIN COUNTY, ALABAMA
VS	Ø	AT LAW
CHARLES SELLERS	Ø	
DEFENDANT	Ø	CASE NO: 10,554

COUNT I.

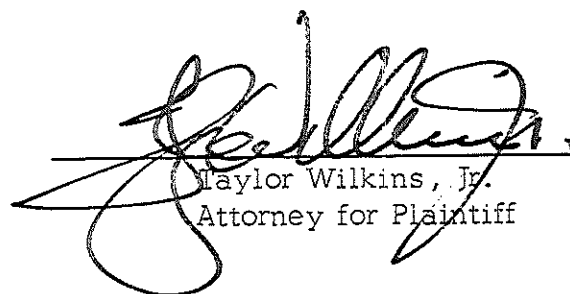
The Plaintiff claims of the Defendant the sum of ONE THOUSAND THREE HUNDRED AND NO/100 (\$1,300.00) DOLLARS due from him by account on, to-wit, the 15th day of August, 1972, which sum of money with interest thereon is still unpaid.

COUNT II.

The Plaintiff claims of the Defendant the sum of ONE THOUSAND THREE HUNDRED AND NO/100 (\$1,300.00) DOLLARS due from him by account stated between the Plaintiff and Defendant on, to-wit, the 15th day of August, 1972, which sum of money with interest thereon is still unpaid.

COUNT III.

The Plaintiff claims of the Defendant the sum of ONE THOUSAND THREE HUNDRED AND NO/100 (\$1,300.00) DOLLARS due from him for work, labor and materials furnished by the Plaintiff to the Defendant, on, to-wit, July 1, 1972, which sum of money with interest thereon is still unpaid.


Taylor Wilkins, Jr.
Attorney for Plaintiff

FILED

AUG 17 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 SELLERS.....

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 Sellers

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

byJerry R. Walker.....

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

witness my hand this.....17.....day of.....August.....1942

.....E. B. Blackman.....Clerk

No. 10,554

Page.....

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Jerry R. Walker

Plaintiffs

VS.

Charles Sellers

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

Clerk

AUG 17 1972

EUNICE B. BLACKMON
CIRCUIT CLERK

Taylor Wilkins, Jr.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Loxley, Alabama

Received in Office

AUG 17 1972

19.....

TAYLOR WILKINS

Sheriff

I have executed this summons

this 8/19 1972

by leaving a copy with

Charles Sellers

Sheriff claims

Filed in

Ten Cents per mile Total \$

TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF

Taylor Wilkins

Sheriff

H. J. Brown

Deputy Sheriff

Ken R. T. Ledy

JERRY R. WALKER

PLAINTIFF

VS

CHARLES SELLERS

DEFENDANT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,554

DEMURRER

Comes now the Defendant, and demurs to the complaint, and to each and every count thereof, and assigns as grounds therefor the following, separately and severally, to each and every count thereof, to-wit:

1. The complaint is vague.
2. The complaint is uncertain.
3. The complaint fails to state when the account became due and payable.


ATTORNEY FOR DEFENDANT

Defendant demands a trial
by jury in this cause.


ATTORNEY FOR DEFENDANT

FILED

SEP 20 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

CERTIFICATE OF SERVICE

I hereby certify that I have on this
18 day of Sept., 1972, served a
copy of the foregoing on counsel of record
for all parties to this proceeding by
depositing same in United State mail
postage prepaid, properly addressed to said
counsel.


Attorney for: Defendant