

AUGUSTINE HOUSTON, * IN THE CIRCUIT COURT OF
Plaintiff * BALDWIN COUNTY, ALABAMA
vs * AT LAW
W. L. INGRAM, doing business *
as INGRAM ELECTRIC COMPANY,
Defendant * CASE NO. 10,588

COUNT I. The plaintiff claims of the defendant TWO THOUSAND & 00/100 DOLLARS (\$2,000.00) damages for the conversion by him on to wit: the 30th day of May, 1972 of the following chattels: One (1) Whirlpool Dishwasher, the property of the plaintiff.

COUNT II. The plaintiff claims of the defendant TWO THOUSAND & 00/100 DOLLARS (\$2,000.00) damages for that on to wit: the 30th day of May, 1972 for the purpose of inducing the plaintiff to deliver certain goods described as a Whirlpool Dishwasher represented to the plaintiff that he could repair the said Dishwasher for the sum of \$52.10. The plaintiff was thereby induced to deliver the said Dishwasher to the defendant together with the sum of \$52.10. The said representation by the defendant to the plaintiff that he could repair the said Dishwasher was false and then known to be or ought to have been known by the defendant to be false and the defendant has appropriated the said Dishwasher to his own use. The plaintiff claims punitive damages and hence this suit.

Augustine Houston
AUGUSTINE HOUSTON

The plaintiff demands a trial by Jury in this cause.

SERVE DEFENDANT:

324 Fairhope Ave.
Fairhope, Alabama

FILED

SEP 1 1972

EUNICE B. BLACKMON
CIRCUIT CLERK

Fred F. Smith, Jr.
FRED F. SMITH, JR.
Attorney for Plaintiff
P.O. Box 487
Fairhope, Alabama 36532

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 SummonW. L. Ingram, d/b/a Ingram Electric Co.

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.....W. L.

Ingram, d/b/a Ingram Electric Co., Defendant.....

byAugustine Houston.....

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

Witness my hand this...../.....day of.....September.....1972.....

.....Eunice B. Blackmon....., Clerk

49-7-72

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Augustine Houston

Plaintiffs

vs.

W.L. Ingram, doing business
as Ingram Electric Co. Defendants

SUMMONS AND COMPLAINT

Filed **FILED** 19.....

SEP 1 1912 Clerk

EUNICE B. BLACKMON CIRCUIT
CLERK

RECEIVED

SEP 1 1912

TAYLOR WILKINS

Fred F. Smith, Jr.
302 DeLaMare
Fairhope, Ala. Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Place of Business:
324 Fairhope, Avenue
Fairhope, Alabama
Received In Office

19.....

Sheriff

I have executed this summons

this 7 Sept 1912

by leaving a copy with

W. F. Ingram

70
TAYLOR WILKINS, Sheriff
W. F. Ingram
DEPUTY SHERIFF

Fred F. Smith, Jr. Sheriff
W. F. Ingram Deputy Sheriff

AUGUSTINE HOUSTON

Plaintiff

VS

W. L. INGRAM, d/b/a INGRAM
ELECTRIC COMPANY

Defendant

X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA

X AT LAW

X

X

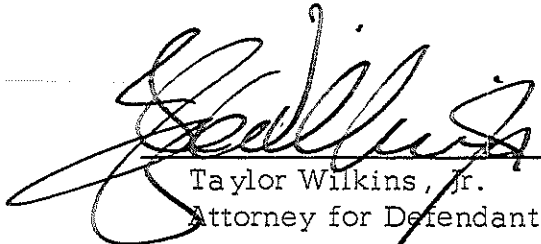
X

CASE NO: 10,588

DEMURRER

Comes now the Defendant, William L. Ingram, 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 the Plaintiff has failed to state a cause of action in said bill of complaint.

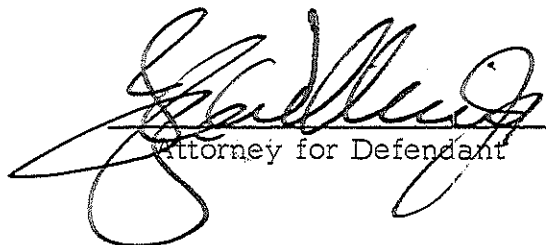

Taylor Wilkins, Jr.
Attorney for Defendant

I, the undersigned, Taylor Wilkins, Jr., do hereby certify that I have on this the 3rd day of October, 1972, forwarded a true and exact copy of the foregoing demurrer to Mr. Fred F. Smith, Jr., Attorney at Law, Fairhope, Alabama, attorney of record for the Plaintiff, by mailing the same in the United States Post Office, properly addressed, with postage paid thereon.

FILED

OCT 4 1972

EUNICE B. BLACKMON CIRCUIT
CLERK


Attorney for Defendant

FRED F. SMITH, JR.
ATTORNEY AT LAW
P. O. BOX 487
FAIRHOPE, ALABAMA 36532

March 15, 1976

302 DELAMARE ST.
FAIRHOPE, AL 36532

TELEPHONE:
928-9276

Mrs. Eunice Blackmon
Clerk - Circuit Court
Baldwin County Court House
Bay Minette, Al 36507

RE: Case No. 10588 - Augustine Houstin vs W.L.Ingram
d/b/a Ingram Electric Company

Dear Mrs. Blackmon:

Please issue an alias execution in the above styled cause
and direct the Sheriff to levy on the Single Tax lease
of the defendant in the premise that he occupies on
Fairhope Avenue, in Fairhope, Al.

Very truly yours,


Fred F. Smith, Jr.

FFS/s

Issued
3-22-76

FILED

MAR 22 1976

EUNICE B. BLACKMON CIRCUIT
CLERK

FRED F. SMITH, JR.

ATTORNEY AT LAW

P. O. BOX 487

FAIRHOPE, ALABAMA 36532

May 26, 1975

FRED F. SMITH, JR.

JOHNNY MACK LANE

302 DELAMARE ST.

FAIRHOPE, ALABAMA

928-9276

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

Re: Augustine Houston vs W.L. Ingram, d/b/a Ingram Electric
Company; Case No. 10588

Dear Mrs. Blackmon:

Please issue an alias execution in the above styled
cause and request the Sheriff to levy on the stock of
merchandise of Ingram Electric Company at their place of
business in Fairhope at 324 Fairhope Avenue in order to
satisfy the judgement in the above case.

Very truly yours,



Fred F. Smith, Jr.

FFS/cll