

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Mable Ganey, to appear within thirty days from the service of this writ, in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the complaint of Hoss'n Buggy, Inc., a Corporation.

Witness my hand, this 19 day of Sept., 1972.

Eunice B. Blackmon
Clerk,

HOSS'N BUGGY, INC., a
Corporation,

Plaintiff,

vs.

MABLE GANEY,

Defendant,

X
X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA

X AT LAW

X CASE NO. 10,610

X
1.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SEVENTY-THREE AND 50/100 (\$173.50), due from her by account on the 21st day of October, 1971, which sum of money with the interest thereon is still unpaid.

WILTERS & BRANTLEY

BY: Henry J. Wilters

Defendant's address is:

Bay Minette, Alabama

FILED

SEP 19 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,610

HOSS'N BUGGY, INC., a
Corporation,

Plaintiff,

vs.

MABLE GANEY,

Defendant

FILED

SUMMONS AND COMPLAINT

SEP 19 1972

RECEIVED

EUNICE B. BLACKMON

CIRCUIT
CLERK

SEP 19 1972

TAYLOR WILKINS

SHERIFF

WILTERS & BRANTLEY

Attorneys - At - Law

P. O. BOX 968

Bay Minette, Alabama 36507

RECEIVED

19 day of

Sept 19 72

and on 19 day of

Sept 19 72

I served a copy of the within

on

Mabel Ganev

By service on

By service on

TAYLOR WILKINS SHERIFF
By W. A. Zeller

HOSS'N BUGGY, INC., a
Corporation

PLAINTIFF

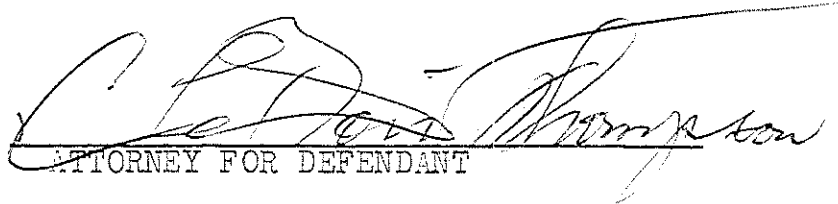
VS

MABLE GANEY

DEFENDANT

* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA
* AT LAW
* CASE NO. 10,610
*
*

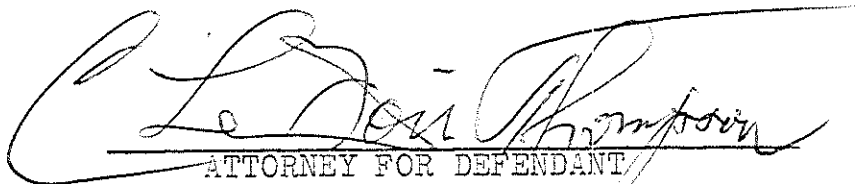
Comes the defendant in the above styled cause and for
aught alleged said complaint fails to state a cause of
action.


ATTORNEY FOR DEFENDANT

Defendant demands a trial by jury.


ATTORNEY FOR DEFENDANT

I hereby certify that I have this the 19th day of October,
1972 served a copy of the foregoing demurrer on Honorable
Harry J. Wilters Jr., Attorney at Law, Bay Minette, Alabama,
Attorney for the Plaintiff, by depositing a copy of same in the
United States Mail postage prepaid.


ATTORNEY FOR DEFENDANT

FILED

OCT 19 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

AMENDED ANSWER

HOSS 'N BUGGY, INC., a
Corporation

PLAINTIFF

VS

H. MARSHPUND

DEFENDANT

* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA
* AT LAW.
* CASE NO. 10,610
*
*


Comes the defendant and for answer to plaintiff's complaint
says as follows:

-1-

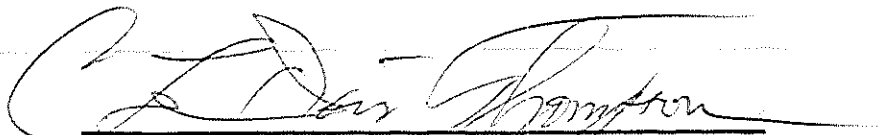
Defendant denies the allegations of said complaint as untrue.

-2-

That the account upon which this suit is brought arises from
an alleged repair service to defendant's automobile which
work was warranted by the plaintiff as to the skill, workmanship
and parts provided by the plaintiff and that said repairs wholly
failed to function and the consideration for said faulty repair
work is the basis of the foregoing suit therefore defendant pleads
an absolute failure of consideration in said cause.


ATTORNEY FOR DEFENDANT

I hereby certify that I have this the 9th day of December, 1972,
served a copy of the foregoing answer on Honorable Harry J. Wilters,
Jr., Attorney at Law, Bay Minette, Alabama, Attorney for Plaintiff,
by depositing a copy of same in the United States Mail postage prepaid.


ATTORNEY FOR DEFENDANT

FILED

DEC 11 1972

EUNICE B. BLACKMON CIRCUIT
CLERK