

HOSS'N BUGGY, Inc., a
Corporation

Plaintiff

vs

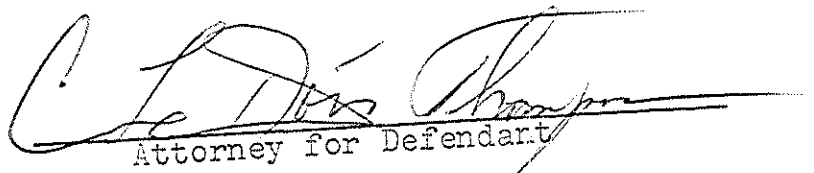
H. MASHPOND

Defendant

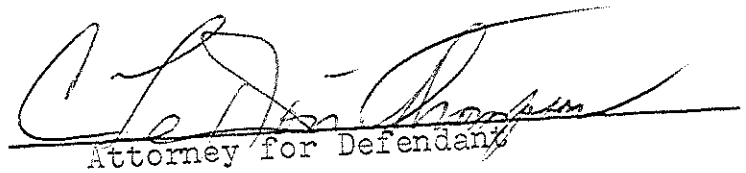
* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA
* AT LAW.
* CASE NO. 10,610
*
*

Comes H. Marshpund and moves this Honorable Court to
strike the complaint filed herein and as grounds for said
complaint shows as follows:

That your movant is not known or identified as H.
Mashpond.


Attorney for Defendant

I hereby certify that I have this the 13 day of October,
1972, served a copy of the foregoing 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
OCT 13 1972
EUNICE B. BLACKMON CLERK
CIRCUIT

HOSS'N BUGGY, INC., a
Corporation

PLAINTIFF

VS

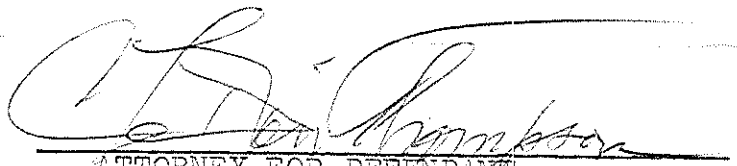
H. MARSHPUND

DEFENDANT

* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA
* AT LAW.
* CASE NO. 10,61b
*
*

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

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 5 day of
November, 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.

FILED

NOV 8 1972

EUNICE B. BLACKMON CIRCUIT
CLERK


ATTORNEY FOR DEFENDANT

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons H. Mashpond, 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.

H. MASHPOND,

Defendant,

X

X

X

X

X

X

I.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,611

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FORTY ONE AND 40/100 (\$141.40), due from him by account on the 4th day of December, 1971, which sum of money with the interest thereon is still unpaid.

WILTERS & BRANTLEY

BY: Gay H. Wilter

Defendant's address is:

Bay Minette, Alabama

FILED

SEP 19 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

Received 19 day of Sept. 1972
and on 19 day of Sept. 1972
I served a copy of the within
on H. Mashpond

By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Colbert D. S.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,611

HOSS'N BUGGY, INC., a
Corporation,

Plaintiff,

VS.

H. MASHPOND,

Defendant

FILED

SEP 19 1972

CLERK OF THE CIRCUIT COURT
RECEIVED
JUDICIAL OFFICE
BALDWIN COUNTY, ALABAMA

SEP 19 1972

TAYLOR WILKINS
SHERIFF


WILTERS & BRANTLEY
Attorneys - At - Law
P. O. BOX 968
Bay Minors, Alabama 36507

FILED

HOSS'N BUGGY, Inc., a	*	IN THE CIRCUIT COURT OF
Corporation,	*	BALDWIN COUNTY, ALABAMA
PLAINTIFF	*	AT LAW
VS	*	CASE NO. 10,670
H. MARSHPUND	*	
Defendant	*	

Comes the Defendant in the above styled cause and propounds the following interrogatories to the Plaintiff, Hoss'n Buggy, Inc., a corporation:

1. State your name.
2. Are you an officer in the plaintiff's complaint?
3. State whether or not any work was done in the repair shop for the defendant. If your answer is yes attach an itemized statement of all work done in the plaintiff's shop for the defendant and list the price of each item involved.
4. State whether or not claim was filed with any insurance company for a portion of the account alleged.
5. Give the name of the insurance company and amount of the payment by said company to the plaintiff, if such was done.
6. State whether or not the defendant has complained to anyone employed by plaintiff, if you know concerning the quality of the alleged work.
7. Set out any complaints noted if such was done which may have been made by the defendant concerning any delay in service on the part of the defendant and the quality of any parts installed or labor repairing said defendant's motor vehicle.


 ATTORNEY FOR DEFENDANT

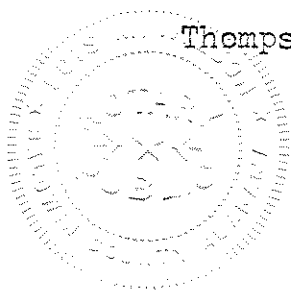
STATE OF ALABAMA
BALDWIN COUNTY

Before, me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on oath and says as follows:

My name is C. LeNoir Thompson, I am the Attorney of Record for the Defendant in the above entitled cause and as such, I am authorized to make this affidavit. I further state that the answer of the Plaintiff to the foregoing interrogatories will, if truthfully made, be material evidence for the Defendant on the trial of said cause.

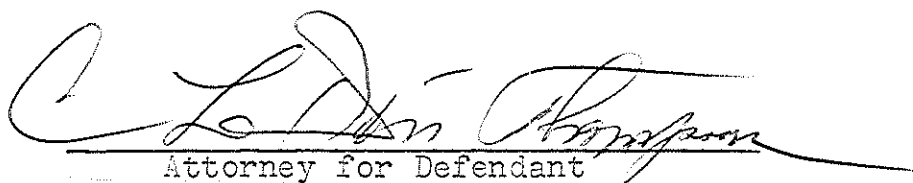

C. LeNOIR THOMPSON

Subscribed and sworn to before me by the said C. LeNoir Thompson on this the 13th day of October, 1972.




NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA.

I hereby certify that I have this the 13th day of October, 1972, served a copy of the foregoing interrogatories 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
OCT 13 1972
EUNICE B. BLACKMON CIRCUIT CLERK

HOSS'N BUGGY, INC., a
Corporation,

Plaintiff,

vs.

H. MASHPOND,

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,610

Comes now the Plaintiff in the above styled cause and
demurs to the Defendant's plea of mis noma, and for grounds thereof
says:

1.

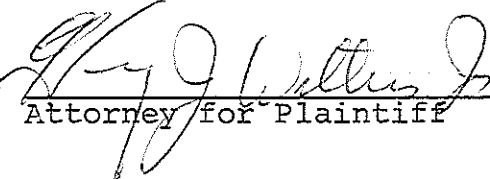
The plea fails to allege the real name of the Defendant.

2.

The Plea is not verified.

WILTERS & BRANTLEY

BY


Attorney for Plaintiff

Filed: October 18, 1972
J.G.M.