

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Atlas Steel Corporation, a corporation, to appear within thirty days from the service of this Complaint in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of August R. Schoen, doing business as Schoen Plumbing, Heating & Air Conditioning Company.

WITNESS my hand this 20<sup>th</sup> day of October, 1972.

Eunice B. Blackburn  
Clerk

AUGUST R. SCHOEN, doing  
business as SCHOEN PLUMBING,  
HEATING & AIR CONDITIONING  
COMPANY,

X

X

X

Plaintiff,

X

vs.

X

ATLAS STEEL CORPORATION,  
a corporation,

X

X

Defendant.

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW CASE NO: 10,667

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Thirty-four Hundred Twenty-three Dollars and Thirty-eight Cents (\$3423.38) due from it for work and labor done for the Defendant by the Plaintiff on the 19th day of November, 1971, at its request, which sum of money, with the interest thereon is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Thirty-four Hundred Twenty-three Dollars and Thirty-eight Cents (\$3423.38) for merchandise, goods and chattels sold by the Plaintiff to the Defendant from, to-wit: the 18th day of June, 1971, until, to-wit: the 19th day of November, 1971, which sum of money, with the interest thereon, is still unpaid.

CHASON, STONE & CHASON

BY: Charles C. Porter  
Attorneys for Plaintiff

Defendant may be served at  
1001 20th Avenue, South,  
Sheffield, Alabama, 35660.

FILED

OCT 20 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

Received \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
and on \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
I served a copy of this within \_\_\_\_\_  
on \_\_\_\_\_ 19\_\_\_\_ 26-73  
By \_\_\_\_\_  
by service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
D. S.

TAYLOR WILKINS, Sheriff of BALDWIN  
COUNTY, ALABAMA, CLAIM \$1.50 EACH  
FOR SERVING \_\_\_\_\_ PROCESS(ES) AND  
TRAVEL EXPENSE ON EACH OF \$ \_\_\_\_\_  
PROCESS(ES) OR A TOTAL OF \$ \_\_\_\_\_

AUGUST R. SCHOEN, doing busi-  
ness as SCHOEN PLUMBING,  
HEATING & AIR CONDITIONING  
COMPANY,

Plaintiff,

VS.

ATLAS STEEL CORPORATION, a  
corporation

OCT 20 1972 Defendant.

\* \* \* \* \*  
CIRCUIT  
CLERK \* \* \* \* \*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW  
RECEIVED NO 14667

\* \* \* \* \* OCT 24 1972 \* \* \* \* \*

TAYLOR WILKINS  
SHERIFF  
SUMMONS AND COMPLAINT

\* \* \* \* \*

CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P. O. Box 120  
BAY MINETTE, ALABAMA

STATE OF ALABAMA  
COLBERT COUNTY

I, C. G. Ayers, Sheriff of Colbert County, Alabama,  
do hereby certify that I have traveled 10 miles  
serving a copy of \_\_\_\_\_  
on Al Wilkitt

This The 24 day of OCT, 1972  
C. G. Ayers  
By Robert R. Rouseph  
D. S.

KIRK, RATHER & HUGHSTON

ATTORNEYS AT LAW

OLD STATE NATIONAL BUILDING

P. O. BOX 70

TUSCUMBIA, ALABAMA 35674

November 6, 1972

PHONE 383-5707

JAMES T. KIRK (1938)  
JOHN T. RATHER, JR. (1959)  
HAROLD V. HUGHSTON

Clerk of the Circuit Court  
Baldwin County Court House  
Bay Minette, Alabama 36507

Dear Sir:

Enclosed is Demurrer in Case No. 10,667 - Schoen vs. Atlas  
Steel, which please file.

Yours truly,

  
Harold V. Hughston

Enclosure

AUGUST R. SCHOEN, doing business  
as SCHOEN PLUMBING, HEATING &  
AIR CONDITIONING COMPANY,

Plaintiff

vs.

ATLAS STEEL CORPORATION,  
A Corporation,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW CASE NO: 10,667

Comes defendant and demurs to the complaint and each count thereof,  
separately and severally, and as grounds for said demurrer states the fol-  
lowing, separately and severally:

1. There are no facts alleged which state a cause of action  
against defendant.
2. The complaint and each count thereof alleges as a conclusion  
that defendant is obligated to plaintiff.



Harold V. Hughston  
Attorney for Defendant  
P. O. Box 70  
Tuscumbia, Alabama 35674

**FILED**

NOV 7 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

KIRK, RATHER & HUGHSTON  
ATTORNEYS AT LAW  
OLD STATE NATIONAL BUILDING  
P. O. BOX 70  
TUSCUMBIA, ALABAMA 35674

PHONE 383-5707

March 1, 1973

JAMES T. KIRK (1938)  
JOHN T. RATHER, JR. (1959)  
HAROLD V. HUGHSTON

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

Re: Schoen vs. Atlas Steel -  
Case No. 10667

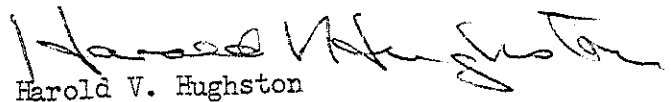
Dear Mrs. Blackmon:

Your docket states that the above case has been set for  
Tuesday, March 13th.

Mr. Charles C. Partin and I have reached an agreement  
on this case and will appreciate it if you will have the same  
continued pursuant to said agreement. Payments are to be made  
regularly on the account pursuant to said agreement.

Thank you for your cooperation.

Yours truly,

  
Harold V. Hughston

**FILED**

MAR 5 1973

EUNICE B. BLACKMON CIRCUIT  
CLERK