STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Universal Development Corporation, Inc., 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 M. D. Dawkins.

WITNESS my hand this 20^{+h} day of October, 1972.

Enrice B. Blackmon

M. D. DAWKINS,	Х
Plaintiff,	X IN THE CIRCUIT COURT OF
vs.	X PAI DUITN COMMUN. ALADAM
	BALDWIN COUNTY, ALABAMA
UNIVERSAL DEVELOPMENT CORPORATION, INC.,	X AT LAW CASE NO: 10,668
Defendant.	X

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Nine Hundred Twenty-nine Dollars and Eighty Cents (\$929.80) due from it for work and labor done for the Defendant by the Plaintiff on, to-wit: the 6th day of January, 1972, 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 Nine Hundred Twenty-nine Dollars and Eighty Cents (\$929.80) for mer-

chandise, goods and chattels sold by the Plaintiff to the Defendant from, to-wit: the 23rd day of December, 1971, until to-wit: the 6th day of January, 1972, which sum of money, with the interest thereon, is still unpaid.

CHASON, STONE & CHASON

BY: Marles C Poster
Attorneys For Plaintiff

Defendant may be served at 2121 8th Avenue, North Birmingham, Alabama, 35203.

FILED

OCT 20 1972

EUNICE B. BLACKMON CIRCUIT CLERK



<u> 200</u>

M. D. DAWKINS,

Plaintiff,

. vs.

UNIVERSAL DEVELOPMENT CORPORATION, INC.,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 10,668

OCT 20 1972 SUMMONS AND COMPLAINT EUNICE B. BLACKMON CLERK

CHASONE & CHASON

ATTORNEYS AT LAW
P. O. BOX 120
BAY MINETTE, ALABAMA

Melvin Bailey, Sheriff of Jefferson County, Alabama, claims \$1.50 each for serving _process(es) and \$1.00 travel expense on each of ____process(es) or a total of Deputy Sheriff Ç. Sperif SZIZIZ 7.441.08 9. $\ddot{0}$ ø

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(i)

of said co MELVIN BAILEY, Sheriff Jefferson County, Alabama

M. D. DAWKINS IN THE CIRCUIT COURT OF PLAINTIFF

BALDWIN COUNTY, ALABAMA

VS AT LAW

UNIVERSAL DEVELOPMENT CORPORATION, INC.

> DEFENDANT CASE NO. 10,668

DEMURRER

Comes the defendant, Universal Development Corporation, Inc., in the above styled cause, and demurs to plaintiff's complaint and to each count thereof, separately and severally, and for grounds of said demurrer, sets down and assigns the following, separately and severally, to-wit:

- 1. The complaint does not state a cause of action against the defendant.
- 2. Said counts do not state a cause of action against the defendant.
- 3. For that the averments of the said counts are vague, indefinite and uncertain.
- 4. For that the averments of said counts are but mere conclusions of the plaintiff.

ATTORNEY FOR DEFENDANT

> HARRY ASMAN ATTORNEY AT LAW

FIFTEENTH FLOOR - CITY NATIONAL BANK BLDG.

BIRMINGHAM, ALA. 35203

TEL: 254-3266

Defendant hereby demands a trial by jury in this cause.

CERTIFICATE OF SERVICE

I certify that I have served a copy of the above and foregoing on all attorneys of record in this case by mailing a copy of the same to them at 1 their office addresses, postage prepaid, this the 17 day of Nov 1972

WOV 18 1972

Eunice B. Blackmon circum

HARRY ASMAN

ATTORNEY AT LAW

THE FIFTEENTH FLOOR - CITY NATIONAL BANK BUILDING BIRMINGHAM. ALABAMA 35203

TELEPHONE 254-3266

December 1, 1972

Judge Telfair J. Mashburn Circuit Court, Baldwin County County Courthouse Bay Minette, Alabama

RE: Dawkins v. Universal Development Corporation Case No. 10,668

Dear Judge Mashburn:

I represent the defendant in the above styled case. I do not wish to argue the demurrer filed. An answer is attached. Please have your clerk notify me of the trial date. Thank you.

Yours truly,

HÀRRY ASMAN

ha/bww

enclosure

CC: Chason, Stone & Chason

M. D. DAWKINS

IN THE CIRCUIT COURT OF

PLAINTIFF

BALDWIN COUNTY, ALABAMA

٧S

UNIVERSAL DEVELOPMENT CORPORATION, INC.

AT LAW

DEFENDANT

CASE NO. 10,668

ANSWER

The defendant, for answer to the complaint says that it tendered to the plaintiff the amount due him, towit: a check for Six Hundred Fifty and no/100 (\$650.00) Dollars before this action was commenced.

ATTORNEY FOR DEFENDANT

HARRY ASMAN ATTORNEY AT LAW FIFTEENTH FLOOR - CITY NATIONAL BANK BLDG. BIRMINGHAM, ALA. 35203 TEL: 254-3266

CERTIFICATE OF SERVICE

| partify that I have served a copy of the above and foregoing on all enterneys of record in this case by mailing a copy of the same to them at their office addresses, postage prepaid, this