

SMITH, HAND, ARENDALL & BEDSOLE
LAWYERS

HARRY H. SMITH
COUNSELOR
CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARD HAND
VIVIAN G. JOHNSTON, JR.
J. JEPHTA HILL

SUITE 622 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

June 11, 1954

MAILING ADDRESS

P. O. BOX 123
MOBILE, ALA.

CABLE ADDRESS:
HAB

2280

Mrs. Alice J. Duck
Clerk, Circuit Court
Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

We enclose our demurrer to the complaint filed by
Crane Company as Plaintiff vs. J. M. Ponder doing business
under the name and style of J. M. Ponder & Company. Please
see that the demurrer is properly filed.

We have sent a copy of this demurrer to Mr. C. M. A.
Rogers who represents the Plaintiff, along with a copy of
this letter.

Your cooperation is always appreciated.

Yours very truly,

SMITH, HAND, ARENDALL & BEDSOLE

BY:

Vivian G. Johnston, Jr.

VGJ:dl

Enc.

cc: C. M. A. Rogers, Esq.

McCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS

ATTORNEYS AT LAW

NINTH FLOOR, MERCHANTS NATIONAL BANK BUILDING
TELEPHONE 3-6556 P. O. BOX 1070

MOBILE 6, ALABAMA

GESSNER T. McCORVEY
BEN D. TURNER
C. M. A. ROGERS
C. A. L. JOHNSTONE, JR.
R. F. ADAMS
JAMES L. MAY, JR.
CHAUNCEY MOORE
ALEX T. HOWARD, JR.

May 26th, 1954.

Mrs. Alice J. Duck,
Clerk of the Circuit Court,
Bay Minette, Alabama.

Dear Mrs. Duck:

Enclosed herewith please find a complaint and a copy of the complaint brought by Crane Company against J. M. Ponder, doing business under the name and style of J. M. Ponder & Company, Fairhope, Alabama.

We shall appreciate it if you will docket this action and forward it on to the Sheriff promptly for service.

Yours truly,

McCorvey, Turner, Rogers, Johnstone & Adams,

By 

R/J
Encl.

Copies to
Clyde Arnold, Esq., Credit Supervisor,
Crane Company,
594¹/₂ Peachtree Street, N.E.,
Atlanta 3, Georgia.

H. L. Worrall, Esq.,
Crane Company,
300 N. Royal Street,
Mobile, Alabama.

6/9/54

RECORDED

No. 2280

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The State of Alabama

Baldwin County

CIRCUIT COURT

GRANE COMPANY, A Corp.,

Plaintiffs

vs.

J. M. PONDER D/B/A

J. M. PONDER & Company

Defendants

Summons and Complaint

Filed 5-27-54 19

Alice J. Duck

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

May 28 1954

Taylor & Wilkins Sheriff

I have executed this summons

this 9 June 1954
by leaving a copy with

J. M. Ponder

Taylor & Wilkins Sheriff

J. M. Ponder Deputy Sheriff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 2280

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon J. M. Ponder, d/b/a J. M. Ponder & Company

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 J. M. Ponder

d/b/a J. M. Ponder & Company, Defendant

by Crane Company, a Corp.

Plaintiff

Witness my hand this 27th day of May 19 54

W. J. Duke, Clerk