

GUSTAV RIEMER AND R. T. RIEMER,
CO-PARTNERS TRADING UNDER THE NAME
AND STYLE OF RIEMERS COMPANY,

Plaintiffs,

VS.

L. T. RHODES, JR.

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

STATE OF ALABAMA)

BALDWIN COUNTY)

Before me, the undersigned authority in and for said
State and County, personally appeared L. T. Rhodes, Jr., who first
being duly and legally sworn deposes and says:

That he is the Defendant in the above styled cause and
that by this affidavit he denies the correctness of the account
set forth in the original complaint filed herein and that he denies
liability therefor and disputes the whole account set forth therein.

L. T. Rhodes Jr.

Sworn to and subscribed before me
on this 28th day of October, 1954.

[Signature]
Notary Public, Baldwin County, Alabama

FILED

Oct. 28, 54

Notary Public, Baldwin County, Alabama

GUSTAV RIEMER AND R. T. RIEMER,
CO-PARTNERS TRADING UNDER THE NAME
AND STYLE OF RIEMERS COMPANY,

Plaintiffs,

VS.

L. T. RHODES, JR.,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

PLEAS

Now comes the Defendant in the above styled cause and for
plea to Count One of the said Complaint says:

1. The account is barred by the Statute of Limitations
of 3 years.

Now comes the Defendant in the above styled cause and for
plea to Count Two of the said Complaint says:

1. The allegations of the Complaint are untrue.

FILED

OCT. 28, 59

ALICE J. DUCK, Clerk

J. B. Blackburn
Attorney for Defendant

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. AT LAW.

GUSTAV RIEMER AND R. T. RIEMER,
CO-PARTNERS TRADING UNDER THE NAME
AND STYLE OF RIEMERS COMPANY,

NO. _____

PLAINTIFFS,

-vs-

L. T. RHODES, JR.

DEFENDANT.

COUNT ONE.

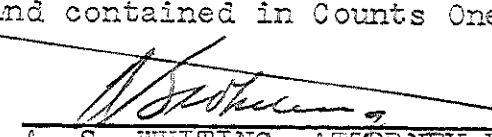
Come the Plaintiffs and claim of the Defendant \$417.00 due from him to the Plaintiffs by account on the 23rd day of December, 1950, which said sum with the interest thereon is still unpaid.

COUNT TWO.

The Plaintiffs further claim of the Defendant the sum of \$417.00 due from him on account stated between the Plaintiffs and the Defendant on to-wit: December 23, 1950, which sum of money with the interest thereon is still unpaid.


A. S. WHITING, ATTORNEY FOR PLAINTIFFS
708-09 Annex, 1st Nat'l Bank Building
Mobile, Alabama.

The Plaintiffs annex hereto and file with this complaint an itemized statement of account verified by affidavit, which the Plaintiffs will offer in evidence in support of the allegations of indebtedness set out and contained in Counts One and Two of this complaint.


A. S. WHITING, ATTORNEY FOR PLAINTIFFS.

Note: Defendant resides at Bay Minette, Alabama.

FILED

9-27-54

ALICE J. GUN, CL.