

BEEBE & SWEARINGEN
LAWYERS
BAY MINETTE, ALABAMA
June 27, 1955

W. C. BEEBE
FLOYD G. SWEARINGEN

2575

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

Dear Mrs. Duck:

With the consent and agreement of the defendant we withdraw our appearance for the defendant in the case of Porter vs Harville, number 2575 on your docket, set for trial Thursday, June 30th. The defendant is aware of the fact that we are withdrawing.

Yours truly,

Beebe & Swearingen

W. C. Beebe
W. C. Beebe

WCB.mb

W. J. PORTER,
Plaintiff

VS

DANIEL HARVILLE,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Comes the defendant in the above styled cause and in answer to the plaintiff's complaint, and to each count thereof separately and severally, says:

ONE:

That the matters alleged therein are untrue.

TWO:

That he has paid the debt, for the recovery of which this suit was brought, before the action was commenced.

FILED

3-24 1900

ALICE J. DUCK, Clerk

BEEBE & SWEARINGEN

BY

J. B. Swearingen
Attorneys for Defendant

CASE #2575

RECORDED

W. J. PORTER,
PLAINTIFF

VS

DANIEL HARVILLE,
DEFENDANT

Ans.

FILED

APR 21 1955

ALICE J. DUCK, Clerk

STATE OF ALABAMA)
*
BALDWIN COUNTY)

BOOK 003 PAGE 480

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Daniel Harville 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 W. J. Porter.

WITNESS my hand, this 24 day of March, 1955.

Alice I. Duck
Clerk

W. J. PORTER,

Plaintiff,

VS.

DANIEL HARVILLE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

Plaintiff claims of the Defendant \$185.50, due from him by account on the 20th day of September, 1954, which sum of money, with the interest thereon is still unpaid.

COUNT TWO:

Plaintiff claims of the Defendant \$185.50 for money on the 20th of September, 1954, received by the Defendant to the use of the Plaintiff which sum of money with the interest thereon, is still unpaid.

FILED

3-24 1955

ALICE I. DUCK, Clerk

W. J. Porter
Attorney for Plaintiff

70 2575
RECORDED

COMPLAINT

W. J. PORTER,

Plaintiff,

VS.

DANIEL HARVILLE,

Defendant.

Received 24 day of MAR 1955

and on 31 day of MAY 1955

I served a copy of the within Complaint

on _____

By service on Daniel Harville

TAYLOR WILKINS, Sheriff

By [Signature] D. S.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

MAR 23 1955

ALICE J. DUCK, Clerk

JAMES R. OWEN

ATTORNEY-AT-LAW

DAY MINETTE, ALABAMA