

2663

GULF TELEPHONE COMPANY,
an Alabama corporation,

PLAINTIFF

VS:

JOHN J. PHILLIPS, d/b/a
Robertsdale Welding Shop,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes the plaintiff by its attorney and for answer to its
Plea in Abatement states as to each count of said plea that, the Gulf
Telephone Company, the plaintiff, is a corporation, duly organized under
the laws of the state of Alabama and authorized to do business in Baldwin
County, State of Alabama.

Said Plea in Abatement is not sworn to by the defendant or any
other person acting on his behalf.


Forest A. Christian,
Attorney for Plaintiff

GULF TELEPHONE COMPANY,

PLAINTIFF

VS

JOHN J. PHILLIPS, d/b/a
Robertsdale Welding Shop

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

Comes now the Defendant in the above styled cause and files this his
Plea in Abatement and for grounds therefor says as follows:

1.

The Plaintiff fails to show in what capacity they are suing.

2.

The Complaint fails to show who is bringing this suit.

Wilters & Brantley

By:

Robert M Brantley
Attorneys for the Defendant

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon JOHN J. PHILLIPS, d/b/a Robertsdale Welding Shop, 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, Alabama, at Bay Minette, against John J. Phillips, d/b/a Robertsdale Welding Shop, by GULF TELEPHONE COMPANY.

Witness my hand this the 15 day of July, 1955.

Reid W. Duck
Clerk

COMPLAINT

GULF TELEPHONE COMPANY,
PLAINTIFF

VS:

JOHN J. PHILLIPS, d/b/a Robertsdale
Welding Shop
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT I

The plaintiff claims of the defednant ONE HUNDRED TWENTY-ONE & 70/100 DOLLARS (\$121.70), due from him by account on, to wit: the 1st day of June, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT II

The plaintiff claims of the defendant ONE HUNDRED TWENTY-ONE & 70/100 DOLLARS (\$121.70), due from him on account stated between the plaintiff and the defendant on, to wit: the 1st day of June, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT III

The plaintiff claims of the defendant ONE HUNDRED TWENTY-ONE & 70/100 DOLLARS (\$121.70), due from him on account stated between the plaintiff and the defendant for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 1st day of June, 1955, which sum of money, with interest thereon, is still unpaid.

James A. Cusick
Attorney for Plaintiff

The Defendant lives at
Robertsdale, Alabama.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 1st day of June, 1955.

James A. Cusick

TELEPHONE NO. _____

RATE _____

TAX _____

D. A. _____

J. T. Arnett
John Phillip
Robertsdale Welding Shop
Robertsdale, Alabama

TOLL	RENT	TAX	DIRECTORY ADVERTISING	MISC.	ARREARS	TOTAL	DATE PAID	M
								JAN
								FEB
								MAR
								APR
9.85	5.00	1.49				16.34*		MAY
						Credit 6.58		
						9.76		
48.55	5.00	5.36			9.76	68.67*		JUN
								JUL
47.45		4.75			68.67	120.87*		AUG
.75		.08			120.87	121.70*		SEP
								OCT
								NOV
								DEC
STATE OF ALABAMA,) BALDWIN COUNTY.)								

I, ZONA CROSS, bookkeeper for Gulf Telephone Company, do hereby certify that the above itemized statement shows the balance of \$121.70, which is a true and accurate account after allowing all just credits.

Zona Cross

CONNECTED	INSTALLATIONS AND MOVES
<i>Sworn & Subscribed</i>	
<i>before me this 13 July 1955</i>	KIND OF TELEPHONE
DISCONNECTED	
July 6, 1954	<i>John Phillip</i>

no 2663

Received 15 day of July 1955
and on 23 day of July 1955
I served a copy of the within BCC
on _____

By service on John J. Phillips

TAYLOR WILKINS, Sheriff

By Edleigh Steadman D.S.

Edleigh

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

GULF TELEPHONE COMPANY,

PLAINTIFF

VS:

JOHN J. PHILLIPS, d/b/a Robertsdale
Welding Shop

DEFENDANT

FILED

JUL 15 1955

Alice J. Duck, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

GULF TELEPHONE COMPANY,
An Alabama Corporation,

PLAINTIFF

VS

JOHN J. PHILLIPS, d/b/a
Robertsdale Welding Shop

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

For Plea and Answer to the Plaintiff's Complaint and to each and every
count thereof the Defendant says:

1.

He does not owe the Plaintiff the amount sued for nor any other amount.

Wiltors & Brantley

BY:

Robert M Brantley
Attorneys for the Defendant