

GLAZER STEEL CORPORATION,  
A CORPORATION,

PLAINTIFF

VS

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

IN THE CIRCUIT COURT OF

BALEWIN COUNTY, ALABAMA,

AT LAW

CASE NO. 2753

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

1.

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

Walters & Brantley

BY:

Robert M. Brantley  
Attorney for the Defendant

GLAZER STEEL CORPORATION

PLAINTIFF

VS

JOHN J. PHILLIPS, doing  
business as Robertsdale  
Welding Shop,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. 2753

DEMURRERS

Comes now the Defendant in the above styled cause and demurs to the Plaintiff's Complaint and each and every count thereof and for grounds therefor says:

1.

The Plaintiff fails to show in what capacity he is suing.

2.

Each count of the complaint purports to be an itemized and verified statement of account but fails to properly incorporate the verification in the Complaint.

Wilters & Brantley

BY:

Robert M Brantley  
Attorneys for the Defendant

The Defendant demands a trial by jury.

Wilters & Brantley

BY:

Robert M Brantley  
Attorneys for the Defendant

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

You are hereby commanded to summon JOHN J. PHILLIPS, doing business as 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, Alabama, against JOHN J. PHILLIPS, doing business as ROBERTSDALE WELDING SHOP, by GLAZER STEEL CORPORATION. *a corporation*

Eric J. Buck  
Clerk

GLAZER STEEL CORPORATION, *a Corporation*

DEFENDANT

Michael J. Chiswick  
Attorney for Plaintiff

COUNTY OF Knox

8G-188 (12743)

STATE OF Tennessee

Be it remembered, that on this 11th day of October  
A. D., 1955, personally appeared before me, the undersigned authority,  
PAUL F. ROACH known to me  
who being duly sworn, upon his oath stated that he is Comptroller  
of GLAZER STEEL CORPORATION  
{ a corporation organized and doing business under the laws of the State of Tennessee  
{ and has been duly authorized by said corporation to make this affidavit  
{ a partnership composed of \_\_\_\_\_  
a sole trader doing business as Steel Fabricators  
and that as such he makes this affidavit; that he is familiar with the books and business of  
said GLAZER STEEL CORPORATION; that the attached account against  
Robertsdale Welding Shop of Robertsdale, Alabama  
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-  
posing the said account were sold and delivered to said Robertsdale Welding Shop  
at { its } special instance and request, that credit has been duly given for all payments and  
{ their }  
{ his }  
just and lawful offsets to which said account is entitled as thereon stated, and that the balance  
thereof, amounting to the sum of TWO HUNDRED EIGHTY-SIX AND 86/100 .....Dollars  
(\$ 286.86 ) with interest from \_\_\_\_\_ 19\_\_\_\_\_ is justly due and  
remains unpaid.

By: Paul F. Roach GLAZER STEEL CORPORATION X  
Paul F. Roach, Comptroller

I hereby certify under my official seal that I am authorized as a Notary Public to  
administer oaths under the laws of the State of Tennessee  
and that the foregoing was subscribed and sworn to before me on the day and year  
first above stated

Frank L. Diggs

Notary Public

County of Knox

State of Tennessee

My commission expires January 20th A. D. 19 58

No. 2753

RECORDED

Received 24 day of Oct 1955  
and on 28 day of Oct 1955  
I served a copy of the within Sum & Cons  
on John J. Phillips

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By Elmer Steadman

We the jury find  
for the defendant.  
Lloyd C. Christnach  
Foreman.

SUMMONS AND COMPLAINT

GLAZER STEEL CORPORATION,

PLAINTIFF

VS:

JOHN J. PHILLIPS, doing business  
as ROBERTSDALE WELDING SHOP,

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

OCT 24 1955

ALICE L. DUCK, Clerk

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LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA