

STATE OF ALABAMA)
)
BALDWIN COUNTY)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Hilliard P. Jenkins and Amelia Jenkins, d/b/a Jenkins Farms, to appear and answer, plead or demur, within thirty days from the service of this writ, to a Bill of Complaint filed against them in Circuit Court, at Law, for said County of said State by Herbert England, Sr., d/b/a H. England Lumber Company, and at the same time and place you are to make return of your actions hereunder.

Given under my hand and seal this 13 day of December, 1955.

Gerie L. Duck
Clerk of Court

Herbert England, Sr.,
d/b/a H. ENGLAND LUMBER
COMPANY,
Plaintiff

vs.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Hilliard P. Jenkins and
Amelia Jenkins, d/b/a
JENKINS FARMS,

Defendants

COUNT ONE:

The Plaintiff claims of the Defendants \$366.91, due from them by account on the 4th day of November, 1954, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendants \$366.91, for merchandise, goods, and chattels, sold by the Plaintiff to the Defendants on the 4th day of November, 1954, which sum of money, with interest thereon, is still unpaid.

Samuel M. Baile
Attorney for Plaintiff

HERBERT ENGLAND, SR., individ-
ually and doing business as
H. ENGLAND LUMBER COMPANY,

Plaintiff,

vs.

HILLIARD P. JENKINS and AMELIA
JENKINS, individually and do-
ing business as JENKINS FARMS,

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO: 2793

PLEAS

Come now the defendants in the above styled cause, by
their attorneys, and for answer to the Complaint heretofore filed
against them and to each count thereof, severally and separately,
plead as follows:

1. The allegations of the complaint are untrue.
2. The allegations of "COUNT ONE" of the complaint are
untrue.
3. The allegations of "COUNT TWO" of the complaint are
untrue.

CHASON & STONE

BY:

Malvina P. Stone
Attorneys for Defendants

The Defendants respectfully demand a trial by jury of
the above styled cause.

CHASON & STONE

BY:

Malvina P. Stone
Attorneys for Defendants

FILED

JAN 18 1956

ALICE L. MOORE, Clerk