

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon H. Eugene Jones 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 the Complaint of Chinchilla Breeders Corporation.

WITNESS my hand this 28 day of March, 1956.

Alice J. Duck
Clerk *by*

Defendant's residence is eight miles East of Robertsdale, Alabama, on U. S. Highway 90.

* * * * *

CHINCHILLA BREEDERS CORPORATION,)
a corporation)
Plaintiff,)
VS.)
H. EUGENE JONES,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

C O M P L A I N T

COUNT ONE

Plaintiff claims of the Defendant the sum of to-wit, Sixteen Hundred Sixty-four and 12/100 Dollars (\$1664.12) damages, for the breach of a written agreement entered into by the Defendant on, to-wit, July 4, 1953, by which he promised to pay to the Plaintiff the sum of One Hundred Sixty-five and 94/100 Dollars (\$165.94) commencing on the 4th day of August, 1953, and continuing on the 4th day of each month thereafter until the sum of Sixteen Hundred Sixty-four and 12/100 Dollars (\$1664.12) had been paid for the purchase of 12 chinchillas; said written instrument provided that in the event of a default in said payments, said default to continue six months, the entire amount would then become due;

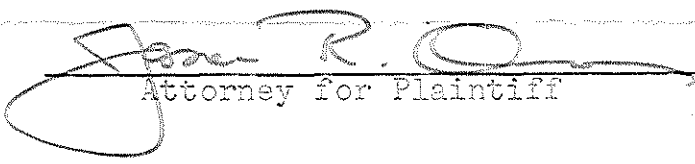
Plaintiff alleges that the Defendant defaulted in said written instrument in that he failed to make the payments provided for therein, leaving a balance of principal due of, to-wit, Sixteen Hundred Sixty-four and 12/100 Dollars (\$1664.12) which the Plaintiff hereby claims with the interest thereon.

COUNT TWO

The Plaintiff claims of the Defendant Sixteen Hundred Sixty-four and 12/100 Dollars (\$1664.12) due from him by account on the 1st day of March, 1956, which sum of money with the interest thereon, is still unpaid.

COUNT THREE

The Plaintiff claims of the Defendant Sixteen Hundred Sixty-four and 12/100 Dollars (\$1664.12) for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 4th day of July, 1953, which sum of money with the interest thereon, is still unpaid.


Attorney for Plaintiff

SUMMONS AND COMPLAINT *X*
2885

CHINCHILLA BREEDERS CORPORATION,

Plaintiff,

VS.

H. EUGENE JONES,

Defendant.

Received 28 day of Mar 1936
and on 2 day of April 1936
I served a copy of the within dec
on H. Eugene Jones

By service on _____

TAYLOR WILKINS, Sheriff

By William Steadham D. S.

Reputable ala

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY Steadham
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT-LAW
FILED

MAR 27 1936

ALICE J. OUCH, Clerk

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

CHINCHILLA BREEDERS CORPORATION.

PLAINTIFF

VS

H. EUGENE JONES

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. 2885

Comes now the Defendant in the above styled cause and for answer to the Plaintiff's Complaint and each and every count thereof separately and severally says:

1.

Not guilty.

Walters & Brantley

BY:

W. Walters
Attorneys for the Defendant

CHINCHILLA BREEDERS CORPORATION,

PLAINTIFF

VS

H. EUGENE JONES

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. 2885

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 the suit.

Wilters & Brantley

BY:

Harry J. Wilters
Attorneys for the Defendant

The Defendant demands a trial by jury.

Wilters & Brantley

BY:

Harry J. Wilters
Attorneys for the Defendant