

3014

THE B. F. GOODRICH COMPANY,

PLAINTIFF

VS.

ROSCOE D. FRIESE,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

Comes the defendant and demurs to the complaint filed in said cause and to each phase thereof separately and severally as follows:

1.

That for aught alleged the said court is not a court of record.

2.

That for aught alleged the court was not in session at the time the said judgment was rendered.

3.

That for aught alleged the said court did not have authority or jurisdiction on matters above \$100.00.

4.

That the said complaint does not state a cause of action.

5.

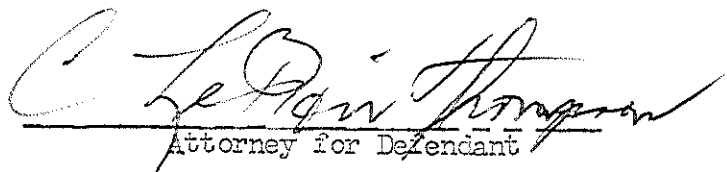
That for aught alleged the allegations are conclusions of the pleader.

6.

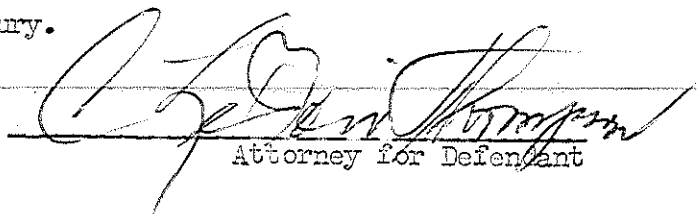
That for aught alleged the said judgment is a judgment by default.

7.

That for aught alleged the defendant was not properly before the court.


Attorney for Defendant

Defendant demands trial by jury.


Attorney for Defendant

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Comes the defendant in the above styled cause and for answer to the complaint, and to each and every phase thereof separately, and severally, says:

1.

Mul tiel record.

2.

The defendant for answer to the said complaint, saith that he has paid the debt, for the recovery of which this suit was brought, before the action was commenced.

Attorney for Defendant

THE B. F. GOODRICH COMPANY
A Corporation

PLAINTIFF

VS

ROSCOE D. FRIESE

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Comes the Defendant in the above styled cause and for answer to the complaint, and to each and every phase thereof separately, and severally, says:

1.

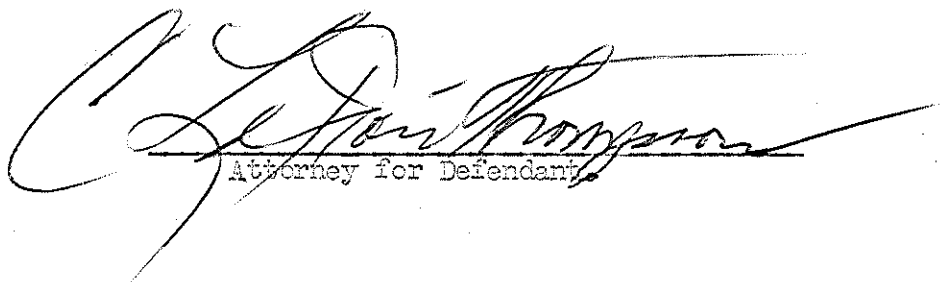
Nul tiel record.

2.

Nul tiel Judgment.

3.

The defendant for answer to the said complaint, saith that he has paid the debt, for the recover of which this suit was brought, before the action was commenced.


Attorney for Defendant

THE B. F. GOODRICH COMPANY,
A Corporation,

PLAINTIFF

VS.

ROSCOE D. FRIESE,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant the sum of EIGHT HUNDRED THIRTY-ONE DOLLARS AND ELEVEN CENTS (\$831.11) due on and by a judgment rendered in favor of the Plaintiff and against defendant, in the sum aforesaid, on the 11th day of February, 1955, in the Court of Common Pleas, Cape Girardeau County, Missouri; which said judgment, with interest at the rate of six percent (6%) per annum, is still unsatisfied, due and unpaid; that said court had jurisdiction of the subject matter, and acquired jurisdiction of the person of the defendant.


E. G. RICKABY
Attorney for the Plaintiff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ROSCOE D. FRIESE

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, State of Alabama, at Bay Minette, against ROSCOE D.

FRIESE

_____, Defendant____

by THE B. F. GOODRICH COMPANY, a Corporation,

_____, Plaintiff____

Witness my hand this 23rd day of aug 1956

alice J. Duck, Clerk
AD

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

August 21, 1956

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: B. F. Goodrich Co.
vs.
Roscoe D. Friese
Our File: 3578

With this I am handing you summons and complaint in
the above styled cause, together with my check for
\$20.00 deposit for costs.

Please process and oblige.

Yours very truly,



fm
Encl:
8-31-56

cc: Mr. Francis E. Sturmi
Attorney at Law
dup
w/encl (dup)