

GULF COAST TRUCK AND
EQUIPMENT COMPANY, INC.,
a corporation,

PLAINTIFF

VS

R. D. FRIESE,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3354.

Comes the Defendant in the above styled cause and for answer to the complaint filed therein and to each count thereof and to each phase of each count thereof separately and severally shows as follows:

1.

He denies all of the allegations of count one.

2.

Defendant denies all of the allegations of count two.

3.

He denies all of the allegations of count three.

Thompson & White
Attorney for Defendant

Defendant respectfully requests a trial by jury.

Thompson & White
Attorney for Defendant

FILED
NOV 13 1957
ALICE I. DUCK, Clerk

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }
Baldwin County.

Circuit Court, Baldwin County

No.

October TERM, 19 57

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon R. 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 R. D. Friese
....., Defendant.

by Gulf Coast Truck and Equipment Company, Inc., a corporation
....., Plaintiff.

Witness my hand this 15 day of October 19 57.

Archie M. ..., Clerk

GULF COAST TRUCK AND
EQUIPMENT COMPANY, INC.,
a corporation,

Plaintiff

vs.

R. D. FRIESE,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW NO. _____.

COUNT I

The plaintiff claims of the defendant NINE HUNDRED AND SIXTY AND 22/100(\$960.22)DOLLARS, due from him by account on the 10th day of June, 1957, which sum of money, with the interest thereon, is still unpaid.

COUNT II

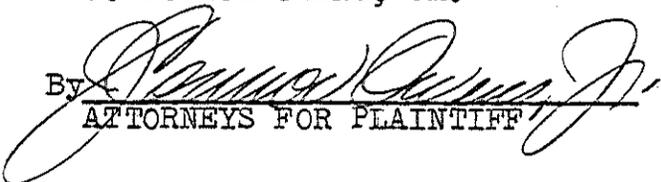
The plaintiff claims of the defendant NINE HUNDRED AND SIXTY AND 22/100(\$960.22)DOLLARS, due from him on account stated between the plaintiff and the defendant on the 10th day of June, 1957, which sum of money, with the interest thereon, is still unpaid.

COUNT III

The plaintiff claims of the defendant NINE HUNDRED AND SIXTY AND 22/100(\$960.22)DOLLARS, due from him for merchandise, goods and chattels sold and for work and labor done for the defendant by the plaintiff on the 29th and 30th of April, 1957, and on the 15th day of May, 1957, at the defendant's request, which sum of money, with interest thereon, is still unpaid.

TONSMEIRE & HODNETTE

J. CONNOR OWENS, JR.

By 
ATTORNEYS FOR PLAINTIFF

Received 15 day of Oct 1957
and on 17 day of Oct 1957
I served a copy of this within 5/8 miles at
on R. D. Frieze
By service on _____
TAYLOR WILKINS, Sheriff
By Edw. S. Steadman D. S.

Robertsdale, Ala

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY Edw. S. Steadman
DEPUTY SHERIFF

BALDWIN COUNTY, ALABAMA
IN LAW. NO. 3354.

GULF COAST TRUCK AND EQUIP-
MENT CO., INC., a corp.

Plaintiff

vs.

R. D. FRIESE,

Defendant

SUMMONS AND COMPLAINT

FILED

OCT 15 1957

ALICE A. DUCK, Clerk

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
101 Court House Square
BAY MINETTE, ALABAMA

Defendant lives at Loxley, Ala.,
with mailing address Rte. 1,
Robertsdale.