

CRAFT CO, INCORPORATED,  
A CORPORATION.

Plaintiff

-VS-

BURNS PHILLIPS JR.

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW.

3480

AMENDED BILL OF COMPLAINT

Comes the Plaintiff in the above styled cause and amends its  
Bill of Complaint to read as follows:

COUNT ONE

Plaintiff claims of the Defendant the sum of ONE HUNDRED  
NINETY SIX AND 22/100(\$196.22)DOLLARS, due from him by account  
on the 3rd day of November, 1956, which sum of money with the  
interest thereon, is still unpaid.

COUNT TWO

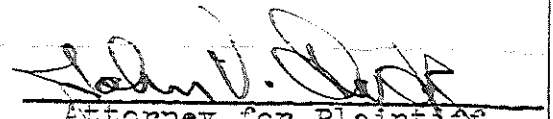
Plaintiff claims of the Defendant the sum of ONE HUNDRED  
NINETY SIX AND 22/100(\$196.22)DOLLARS, on account stated between  
the Plaintiff and Defendant on the 31st day of October, 1957,  
which sum of money with the interest thereon, is still unpaid.

COUNT THREE

Plaintiff claims of the Defendant ONE HUNDRED NINETY SIX  
AND 22/100 (\$196.22)DOLLARS, due as a balance on a Promissory Note  
made by the Defendant on the 23rd day of January, 1957 and pay-  
able on the 23rd day of January, 1958, with interest thereon,  
which sum of money is still unpaid.

The Plaintiff avers that in, by, and as a part of said note  
the Defendant agreed to pay all cost of collecting, or securing  
or attempting to collect or secure such debt, including a reason-  
able attorney's fee whether the same be collected or secured by  
suit or otherwise and the Plaintiff further claims of the Defen-  
dent the further and additional sum of FORTY (\$40.00)DOLLARS, as  
a reasonable attorney's fee.

Plaintiff further avers that in, by and as a part of said note the Defendant waived as to this debt or any renewal thereof, all rights to exemptions under the Constitution and Laws of Alabama as to personal property and of this waiver the Plaintiff now claims the benefit.

  
Attorney for Plaintiff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 3480

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon BURNS PHILLIPS, JR.

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

BURNS PHILLIPS, JR.

Defendant

by CRAFT CO. Incorporated, a Corporation

Plaintiff

Witness my hand this 12 day of March 1958

Alice J. Duck, Clerk

CRAFT CO., INCORPORATED,  
A CORPORATION

Plaintiff

VS

BURNS PHILLIPS, JR.

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

DEMURRER

Comes the Defendant in the above styled cause and demurs to the complaint filed in said cause and assigns the following separate and several grounds, viz: .

1. That said complaint does not state a cause of action.
2. That said Count One fails to allege that said account was contracted by the said defendant.
3. That said Count One fails to allege that said account was incurred or authorized by said defendant.
4. That said Count Three fails to allege to whom the said promissory note was made payable or how the said Plaintiff holds or obtained said promissory note.
5. That said Count Three fails to allege to whom said promissory note was made payable.

C. Le Hair Thompson  
Attorney for Defendant

The Defendant demands a trial of this  
cause by jury.

C. Le Hair Thompson  
Attorney for Defendant