

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon EUBIE B. BYRD 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 complaint of MRS. NETTIE L. MARTIN doing business as Martin Automotive Supply Company.

WITNESS my hand this 3rd day of April, 1958.

Robert M. Brantley
Clerk

MRS. NETTIE L. MARTIN, d/b/a
MARTIN AUTOMOTIVE SUPPLY
COMPANY,

PLAINTIFF

VS

EUBIE B. BYRD

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

3495

1.

The Plaintiff claims of the Defendant the sum of SIX HUNDRED SEVENTY NINE and 86/100 (\$679.86) DOLLARS due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 25th day of May, 1957, which sum of money with interest thereon is stillunpaid.

2.

The Plaintiff claims of the Defendant SIX HUNDRED SEVENTY NINE and 86/100 (\$679.86) DOLLARS due from him by account on the 25th day of May, 1957, which sum of money with interest thereon is still unpaid.

Ex. April 2, 1958

Wilters & Brantley

BY:

Robert M. Brantley
Attorney for the Plaintiff

MRS. NETTIE L. MARTIN, d/b/a		IN THE CIRCUIT COURT OF
MARTIN AUTOMOTIVE SUPPLY		
COMPANY,		
PLAINTIFF		BALDWIN COUNTY, ALABAMA
VS		
		AT LAW
EUBIE B. BYRD		
DEFENDANT		

Comes the Defendant in the above styled cause and demurring to Plaintiff's complaint and to each count thereof separately and severally says:

1. That the said complaint does not state cause of action.
2. That the said complaint does not allege sufficient facts to apprise the Defendant of what he is called upon to answer.
3. That the said complaint is vague and indefinite.
4. For aught that appears from said complaint, the sum of money sued for therein is the property of the Defendant.
5. For aught that appears in said complaint, the sum of money sued for therein is not the property of the Plaintiff.
6. For aught that appears from said complaint the sum or sums of money sued for therein are not due.

Filed
May 3, 1958
Alice J. Luck

BEEBE & SWEARINGEN

BY *F. B. Swearingen*
Attorneys for Defendant

MRS. NETTIE L. MARTIN, d/b/a
MARTIN AUTOMOTIVE SUPPLY
COMPANY,

PLAINTIFF

VS

EUBIE B. BYRD

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

Comes the defendant in the above styled cause and
answering plaintiff's bill of complaint, says:

1. That the matters alleged therein are untrue.
2. That the account sued for therein has been paid.

Filed
Dec. 16, 1958
Alice J. Luck.

BEEBE & SWEARINGEN

BY *F. B. Swearingen*
Attorneys for defendant