

MRS. ETHEL H. RAY and E.M.
KING, JR., d/b/a ATMORE
EQUIPMENT COMPANY,

Plaintiffs,

vs.

B. T. TURNER,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3509

Comes the Defendant in the above styled cause and for plea
to the complaint filed in said cause, says:

1. That the allegations of the complaint are untrue.

Filed
Jan. 9, 1959
Alice J. Clark
clerk

James H. Stone
Attorneys for Defendant

3509
MRS. ETHEL H. RAY AND E. M.
KING, JR., d/b/a ATMORE EQUIP-
MENT COMPANY,

Plaintiffs,

vs.

B. T. TURNER,

Defendant

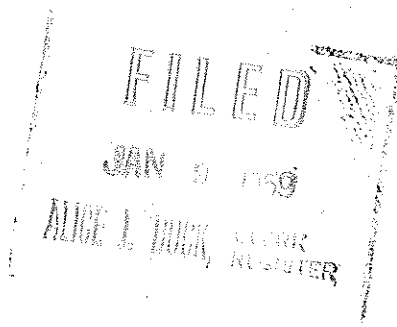
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3509

PLEA



LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

He the Jury find for the Plaintiff in the amount of \$317.00
James H. Chason

Mrs. Ethel Vayg vs Turner

JURY LIST, SPRING TERM, MARCH 11, 1960

- ~~Bollard, Louis, Machinist, Foley~~
~~Boyd, Harry Lee, Farmer, Stapleton~~
~~Heims, Kenneth B., Civil Service, Elberta~~
~~Heims, John R., Civil Service, Elberta~~
~~King, Orphens N., Jr., Clerk, Bay Minette~~
~~Kirz, Donald, Civil Service, Elberta~~
~~Hughes, Wayne, Motel Owner, Fairhope~~
~~8. Bishop, Earnest E., Meat Packer, Fairhope~~
~~9. Cooper, M.O., Carpenter, Robertsdale~~
~~10. Cooper, Ted W., Livestock Dealer, Robertsdale~~
~~11. Corcoran, Ferdinand A., Farmer, Loxley~~
~~12. Gipe, Leon Fisher, Mechanic, Bay Minette~~
~~13. Harrison, John, Laborer, Summerdale~~
~~14. Parker, Joe G., Farmer, Bon Secour~~
~~15. Gamble, A. Jack, Salesman, Bay Minette~~
~~16. Gentry, R. D., Farmer, Little River~~
~~17. Peavy, Richard V., Building Sup't., Foley~~
~~18. Pilgrim, A.L., Farmer, Elberta~~
~~19. Pilgrim, H.E., Farmer, Elberta~~
~~20. Pilgrim, Joseph A., Jr., Farmer, Elberta~~
~~21. Reed, M.T., Postal Clerk, Bay Minette~~
~~22. Slunt, Hugh Pealy, Bricklay Field, Bay Minette~~
~~23. Stone, Will, Farmer, Little River~~
~~24. Bryant, John Lee, Farmer, Cockrum~~
~~25. Mustang, Delham D., Bricklay Field, Bay Minette~~
~~26. Childress, William, Farmer, Summerdale~~
~~27. Childress, William, Farmer, Summerdale~~
~~28. Childress, Charles, Farmer, Bay Minette~~
~~29. Cleveland, Paul L., Farmer, Summerdale~~
~~30. Anderson, Herbert E., Farmer, Foley~~
~~31. Armstrong, William, Civil Service, Elberta~~
~~32. Williams, Bryant, Farmer, Fairhope~~
~~33. Wenzel, Emmett O., Merchant, Gulf Shores~~
~~34. Walters, Thomas W., Farmer, Bon Secour~~
~~35. Craft, Edwin P., Farmer, Foley~~
~~36. Grull, Calvin, Creamery, Fairhope~~
~~37. Dean, David E., Farmer, Little River~~
~~38. Bell, Walter, Machinist, Bon Secour~~
~~39. Flowers, Albert T., Farmer, Gulf Shores~~
~~40. Ford, W.B., Jr., Type Setter, Foley~~
~~41. Laffan, Laurence F., Machinist, Foley~~
~~42. Lazzari, Angelo, Farmer, Belforest~~
~~43. Lazzari, Joe, Farmer, Daphne~~
~~44. Graham, James R., Laborer, Bay Minette~~
~~45. Graham, John G., Bricklay Field, Bay Minette~~
~~46. Gentry, Ray, Farmer, Bay Minette~~
~~47. Colledge, William, Farmer, Robertsdale~~
~~48. Galtney, John L., Farmer, Robertsdale~~

P XXXX XXXXX X

D XXXX XXXXX X

48
24
24

MRS. ETHEL H. RAY AND E.
M. KING, JR., d/b/a ATMORE
EQUIPMENT COMPANY,

Plaintiff,

vs.

B. T. TURNER,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER 3509

Comes the Defendant in the above styled cause and demurs to the complaint filed in said cause and to each and every count thereof, separately and severally, and assigns the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That count "1" of the complaint does not allege the amount of interest claimed by the Plaintiff.
3. That count "2" of said complaint attempts to combine a count for goods, wares and merchandise with a count for work and labor done.
4. That count "2" of said complaint does not allege that the merchandise, goods, and chattels were sold by the Plaintiff to the Defendant.
5. That it is not alleged in count "2" of said complaint whether the merchandise, goods and chattels were sold to the Defendant on August 2, 1957 or whether the work and labor done for the Defendant was on August 2, 1957.

Chas. & Stone
Attorneys for Defendant

Defendant respectfully demands a
trial of this cause by jury.

Chas. & Stone
Attorneys for Defendant

Filed
May 5, 1958
Alice J. Duck
clerk

3509

MRS. ETHEL H. RAY ET AL.,

Plaintiff,

vs.

B. T. TURNER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

DEMURRER

FILED

MAY 5 1958

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA

WITNESS my hand, this 11 day of April, 1958.

Clerk

VS

DEFENDANT

1.

2.

Wiltors & Brantley

BY:

Attorney for the Plaintiff