STATE OF ALABAMA )
) . . . IN THE CIRCUIT COURT . . LAW SIDE . . .
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Richard Hoffman to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of Mary O. Wilcox.

WITNESS my hand this the 24 day of June, 1958.

accent-house

- COMPLAINT -

MARY O. WILCOX,

Plaintiff,

-vs-

RICHARD HOFFMAN.

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

## COUNT I

The Plaintiff claims of the Defendant Four Thousand Two Hundred Forty and 30/100 Dollars (\$4,240.30) on account stated, between the Plaintiff and the Defendant, on the 13th day of April, 1954, the last credit on said account being made on the 28th day of July, 1955, which sum of money, with the interest thereon, is still unpaid.

Attorney for the Plaintiff

Defendant's address is Miflin, Alabama

Executed July 11, 1938

236

Received 25 day of June 1958 and on Aday of the within on Alchard Noffman

TAYLOR WILKINS Sheriff

BARRIOL Declier D. S.

Tilley

Ten Cents per mile Total-\$ inlles at TAYLOR WILL INS Sheriff

SUMMONS AND COMPLAINT

MARY O. WILCOX,

Plaintiff,

-VS-

RICHARD HOFFMAN,

Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA LAW SIDE

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JUN 24 1958; ALICE I. BUCK, Clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

MARY O.	WILCOX Plaintiff	)	IN THE CIRCUIT COURT OF
vs		)	BALDWIN COUNTY, ALABAMA
RICHARD	HOFFMAN Defendant	)	IN LAW
		,	Case No. 3596

Comes the defendant in the above styled cause and withdraws his demand for a jury trial and consents that judgment may be entered for the plaintiff.

Filed 3-11-5-9

Attorney for the Defendant

MARY O. WILCOX,

Plaintiff.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

RICHARD HOFFMAN,

Defendant

Defendant

Comes the Defendant in the above styled cause and demurs to the Bill of Complaint and for grounds of demurrer does as follows:

- 1. The complaint does not show on what date the account was stated.
- 2. The complaint does not set out the date from which the interest is claimed.
- 3. The Bill of Complaint does not show with sufficient certainty the amount of money which is claimed to be unpaid.
- amount of money upon which interest is claimed.
- 5. The Bill of Complaint does not show that any amount of money is owing from the Defendant to the Plain-tiff.

Attorney For Defendant

Defendant demands a trial by jury.

triate by jury.

Lilia Aug 19,1958

MARY O.	WILCOX, Plaintiff.	)	IN THE CIRCUIT COURT OF
-vs-		)	BALDWIN COUNTY, ALABAMA
RICHARD	HOFFMAN, Defendant	)	LAW SIDE

Comes the Defendant in the above styled cause and demurs to the Bill of Complaint and for grounds of demurrer does as follows:

- 1. The complaint does not show on what date the account was stated.
- 2. The complaint does not set out the date from which the interest is claimed.
- 3. The Bill of Complaint does not show with sufficient certainty the amount of money which is claimed to be unpaid.
- 4. The Bill of Complaint does not set out the amount of money upon which interest is claimed.
- 5. The Bill of Complaint does not show that any amount of money is owing from the Defendant to the Plaintiff.

Defendant demands a

## CECIL G. CHASON

ATTORNEY-AT-LAW FOLEY, ALABAMA

June 23, 1958

Mrs. Alice J. Duck, Clerk Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Summons and Complaint in the suit of Wilcox -vs- Hoffman.

Yours very truly

G Chasen

CGC:fm

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