

3662

CRAFT CO., INCORPORATED,  
A Corporation,

Plaintiff,

vs.

ANTHONY BETSIARAS,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

PLEAS

Comes the Defendant in the above styled cause and for plea to "COUNT ONE" of the complaint filed in said cause, separately and severally, says:

1. That the allegations of the complaint are untrue.

2. For further plea to said complaint and as a set-off the Defendant alleges that the work and labor performed by the Plaintiff for the Defendant and the materials furnished by the Plaintiff to the Defendant, which are the basis of this suit, were defective in this: the thermostat controlling the heat in the building owned by the Defendant was not properly installed and has never functioned in its proper manner; the Plaintiff was authorized to put a point on a pump located upon the Defendant's property but contrary to such authorization it removed the pump and installed therein things which it was not authorized to install and such installation was in such manner that the pump never functioned properly and has now burned out and will not operate. The electric wiring which the Plaintiff was installing for the Defendant was improperly installed and has constantly caused trouble. That the reasonable cost to the Defendant of getting the thermostat, pump and the electric wiring in a proper and workmanlike condition will be approximately Five Hundred Dollars (\$500.00) which the Defendant now offers to set-off against the account sued upon by the Plaintiff.

*Filed  
Oct. 30, 1958*

*James A. Stone*  
Attorneys for Defendant

3662

PLEAS

CRAFT CO., INCORPORATED, A  
Corporation,

Plaintiff,

VS.

ANTHONY BETSIARAS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

OCT 20 1958

ALICE J. DUCK, CLERK  
REGISTER

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY ALABAMA,  
AT LAW.

COUNT ONE :

Plaintiff claims of the Defendant, the sum of FIVE HUNDRED AND TWENTY EIGHT and 88/100(\$528.88)DOLLARS, due by Promissory Note made by him on the 6th day of May, 1958, and payable the 6th day of March, 1959, with interest thereon.

Plaintiff avers that in, by and as a part of said note, the Defendant agreed to pay Twenty Five (\$25.00) Dollars on the first day of each and every month thereof, and Plaintiff further avers that the said Defendant has defaulted on said note by not paying but one of said installments.

Plaintiff further avers that in, by and as a part of said note the Defendant agreed to pay all costs of collecting , or securing or attempting to collect or secure such debt, including a reasonable Attorneys fee whether the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant, the further and additional sum of One Hundred (\$100.00) Dollars as a reasonable Attorneys 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.

Filed  
Sept. 25, 1958

Exp. Oct. 1, 1958

Attorney for Plaintiff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. ....

..... TERM, 19....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ANTHONY BETSIARAS

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 .....

ANTHONY BETSIARAS

....., Defendant.....

by CRAFT CO., INCORPORATED, A Corporation

....., Plaintiff.....

Witness my hand this 25 day of September 1958

Alice J. Slack, Clerk

CRAFT CO., INCORPORATED,  
A Corporation,

Plaintiff,

vs.

ANTHONY BETSIARAS,

Defendant

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

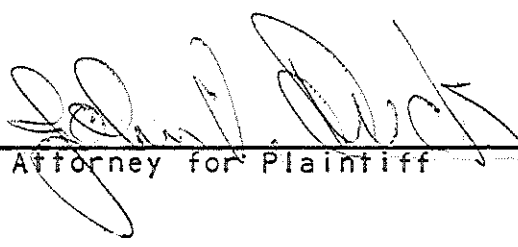
AT LAW

REPLICATION

Comes now the Plaintiff in the above styled cause and for  
reply to the pleas file by the Defendant in said cause, separately  
and severally, says:

1. For reply to Paragraph One of said plea: Plaintiff  
joins issue thereon.

2. For reply to Paragraph Two of said Pleas That Plaintiff  
is not guilty.

  
Attorney for Plaintiff

FILED

MAY 18 1959

ALICE J. DUCK, Clerk

No. 3662

Page \_\_\_\_\_

The State of Alabama  
Baldwin County

CIRCUIT COURT

CRAFT CO. INC. A Corporation

Plaintiffs

vs.

ANTHONY BETSIARAS

Defendants

Summons and Complaint

Filed

**FILED**

19

SEP 25 1958

Clerk

ALICE J. DUCK, Register

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Town & Country Restaurant  
Highway 31. Spanish Ft. Ala.

Received In Office

9/25 1958

Sheriff

I have executed this summons

this 1 Oct. 1958

by leaving a copy with

Sheriff claims 44 miles at 4 10

Ten Cents per mile Total \$ 4.40

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff

Spencer Deputy Sheriff