

3690

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John A. Kuklo, Jr. 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 same, then and there to answer to the complaint of George D. Wise and Juanita M. Wise, individually and doing business as Southern Artificial Breeders, a partnership.

Witness my hand this the 29 day of October, 1958.

Alice J. Duck
Clerk.

GEORGE D. WISE and JUANITA	Y	
M. WISE, individually and		
doing business as SOUTHERN	Y	IN THE CIRCUIT COURT OF
ARTIFICIAL BREEDERS, A		
Partnership,	Y	
Plaintiffs,	Y	BALDWIN COUNTY, ALABAMA
vs.	Y	
	Y	AT LAW
JOHN A. KUKLO, JR.,	Y	
Defendant.	Y	

COUNT ONE:

The Plaintiffs claim of the Defendant the sum of One Thousand Seven Hundred and Three Dollars and Seventeen Cents (\$1,703.17), due from him by account on the 1st day of May, 1957, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiffs claim of the Defendant the sum of One Thousand Seven Hundred and Three Dollars and Seventeen Cents (\$1,703.17) due from him for money on the 30th day of April, 1957, received by

the Defendant to the use of the Plaintiffs, which sum of money, with the interest thereon is still unpaid.

CHASON & STONE

By:

Marion V. Stone
Attorneys for Plaintiffs.

Defendant's address: Robertsdale, Alabama

Executed Nov. 19, 1908

Received 31 day of Oct 1958
and on 10 day of Nov 1958

served a copy of the within 82
on John A. Kuklo Jr.

By service on _____

TAYLOR WILKINS, Sheriff
By Edw. H. Shadham, Jr.

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff

BY Shadham
DEPUTY SHERIFF

Robert Dale, Ala

3690

GEORGE D. WISE and JUANITA M.
WISE, individually and doing
business as SOUTHERN ARTIFICIAL
BREEDERS, A Partnership,

Plaintiffs,

vs.

JOHN A. KUKLO, JR.,

Defendant.

SUMMONS AND BILL OF COMPLAINT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED
OCT 29 1958
ALICE J. DUCK, Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

3690

GEORGE D. WISE AND JUANITA
M. WISE, Individually and
d/b/a SOUTHERN ARTIFICIAL
BREEDERS, a partnership,

PLAINTIFFS

VS

JOHN A. KUKLO, JR.

DEFENDANT

ANSWERS

FILED

DEC 19 1958

ALICE J. DUCK/clerk

GEORGE D. WISE AND
JUANITA M. WISE,
individually and
d/b/a SOUTHERN ARTIFICIAL
BREEDERS, a partnership,
PLAINTIFFS

vs

JOHN A. KUKLO, JR.

DEFENDANT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

Comes now the Defendant and for answer to the Plaintiffs' complaint
and each count thereof separately and severally says:

1.

That the matters alleged therein are untrue.

2.

That he is not guilty of the matters alleged therein.

3.

That he has paid the debt for the recovery of which this suit was
brought, before the action was commenced.

Wiltors & Brantley

BY:

Robert M. Brantley
Attorneys for the Defendant

The Defendant demands a trial by jury.

Wiltors & Brantley

BY:

Robert M. Brantley
Attorneys for the Defendant

Filed
Dec. 9, 1958
Alice J. Luck,
clerk