

3711

S U M M O N S

STATE OF ALABAMA)
COUNTY OF BALDWIN) IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA - - - GREETING:

You are hereby commanded to summons James M. Campbell to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of Baldwin Chemical Company, a corporation.

Witness my hand this 19 day of Nov, 1958.

Alice J. Alcock
Clerk

C O M P L A I N T

BALDWIN CHEMICAL COMPANY, a)
corporation d/b/a NITROGEN)
SERVICE COMPANY) IN THE CIRCUIT COURT OF
Plaintiff) BALDWIN COUNTY, ALABAMA
vs.)
JAMES M. CAMPBELL) AT LAW 3711
Defendant)

I.

The plaintiff claims of the defendant Four Hundred Fifty-five & 75/100ths (\$455.75) Dollars, due from him on account, to-wit: the 8th day of March, 1957, which sum of money, with interest thereon, is still unpaid.

II.

The plaintiff claims of the defendant Four Hundred Fifty-five & 75/100ths (\$455.75) Dollars, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: the 8th day of March, 1957, which sum of money with interest thereon, is still unpaid.

James A. Alcock
Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof, an itemized statement of account verified by affidavit of (Mrs.) Thelma Stephens, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 8th day of March, 1957, and due at present.

The defendant resides at Robertsdale, Alabama.

Received 19 day of Nov 1958

and on 3 day of Dec 1958

Served a copy of the within 29C

James M. Campbell

service on _____

TAYLOR WILKINS, Sheriff

By Edw. H. Steadman D. S.

Sheriff claims 52 miles at

Ten Cents per mile Total \$ 5.20

TAYLOR WILKINS, Sheriff

BY Steadman

DEPUTY SHERIFF

Resentment

3711

Baldwin Chemical Co

VS

James M. Campbell

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7 455.75

STATE OF ALABAMA
BALDWIN COUNTY

Before me, David L. McKeown, a Notary Public, in
and for said County and State, personally appeared Mrs.
Thelma Stephens who, being by me first duly sworn,
deposes and says, that she is bookkeeper for Baldwin Chemical Co
and that the annexed statement of the account of said Baldwin
Chemical Co. against James M. Campbell of Robertsdale, Ala.
is just, true and correct, that there is now due on said
account the sum of \$455.75, after deducting all credits,
set-off or any counterclaims.

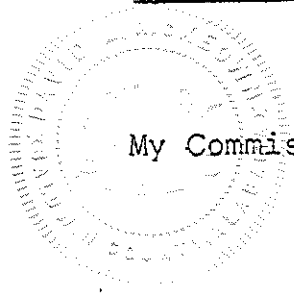
Mrs Thelma Stephens
Bookkeeper

Sworn to and subscribed before me this 10th day of
Nov. 1958.

David L McKeown
Notary Public, Baldwin County
Alabama.

My Commission Expires _____

My Commission Expires December 19, 1959



195

Robertsdale Ala.

NITROGEN SERVICE COMPANY

~~SUMMERDALE, ALABAMA~~

[illegible]

BALDWIN CHEMICAL COMPANY, a
Corporation, d/b/a Nitrogen
Service Company,

Plaintiff,

vs

JAMES M. CAMPBELL,

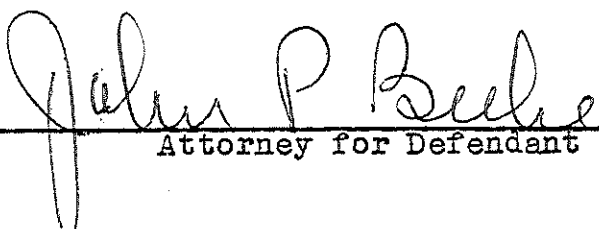
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

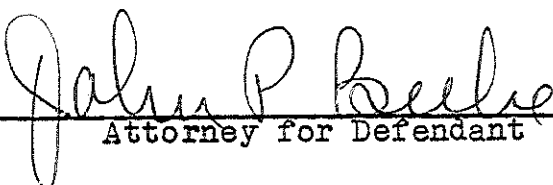
Comes the Defendant in the above entitled cause and for
answer to the complaint filed therein says that the allegations of
the complaint are untrue.


Attorney for Defendant

The Defendant demands trial by jury.

I hereby certify that I have on this the 23rd day of Dec-
ember, 1959, sent a true and exact copy of the foregoing answer by
United States Mail, postage prepaid, to Mr. James A. Brice, Foley,
Alabama, attorney of record for the Plaintiff.

FILED
DEC 23 1959
ALICE J. DUCK, Clerk


Attorney for Defendant

BALDWIN CHEMICAL COMPANY, A
CORPORATION d/b/a NITROGEN
SERVICE COMPANY,

PLAINTIFF

VS

JAMES M. CAMPBELL

DEFENDANT

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

DEMURRERS

Comes now the Defendant in the above styled cause and files the following demurrers to the Plaintiff's Complaint and to each and every count thereof separately and severally:

1.

The Complaint fails to state a cause of action.

2.

The Complaint is ambiguous.

3.

The Complaint fails to show whether the Exhibit A is a part of Count 1 or a part of Count 2.

Wilters & Brantley

BY: James M. Brantley
Attorneys for the Defendant

The Defendant demands a trial by jury.

Wilters & Brantley

BY: James M. Brantley
Attorneys for the Defendant

Filed
1-2-59

3711

Jan

BALDWIN CHEMICAL COMPANY, A
CORPORATION, d/b/a NITROGEN
SERVICE COMPANY,

PLAINTIFF

VS

JAMES M. CAMPBELL

DEFENDANT

DEMURRERS

FILED

JAN 12 1958

ALICE J. DUCK, CLERK
REGISTER

December 15, 1959

Mr. James M. Campbell
Robertsdale, Alabama

Dear Mr. Campbell:

We are withdrawing our appearance in the three cases now filed in court against you, these cases being No. 3708, 3707 and 3711. Please employ another attorney to pursue this matter for you if you see fit. Unless this is done within thirty days a default judgment will probably be rendered against you.

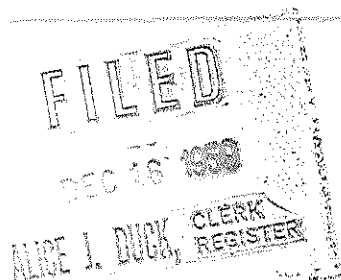
Yours truly,

Walters & Brantley

By:

Albert M. Brantley
Albert M. Brantley

TMB/cw



HARRY J. WILTERS, JR.
TOLBERT M. BRANTLEY
ASSOCIATE:
PHYLLIS S. NESBIT

LAW OFFICES OF
WILTERS & BRANTLEY
P. O. BOX 327
BAY MINETTE, ALABAMA
P. O. BOX 337
ROBERTSDALE, ALABAMA

PHONES
BAY MINETTE 5151
ROBERTSDALE WI 7-4682

December 15, 1959

Mrs. Alice J. Duck
Bay Minette, Alabama

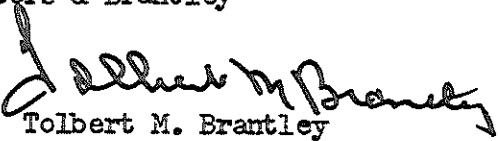
Dear Mrs. Duck:

Please file a copy of the enclosed letter in cases No. 3707, 3708
and 3711 in which James M. Campbell appears as the defendant.

Yours truly,

Wilters & Brantley

By:


Tolbert M. Brantley

TMB/ew