

MARVIN L. LAMBETH, Individually,  
and d/b/a LAMBETH'S SERVICE  
STATION,

Plaintiff,

VS.

L. R. PHILLIPS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

NO. 3772  
#88

Comes the defendant in the above-styled cause, and, for answer to the complaint heretofore filed in said cause and to each and every count thereof, separately and severally, sets down and assigns the following separate and several pleas:

1. The allegations of said complaint are untrue.

Justin A. Maslow  
ATTORNEY FOR DEFENDANT.

Defendant demands that this cause be tried by a jury.

Justin A. Maslow  
ATTORNEY FOR DEFENDANT.

*Filed*  
*April 23, 1959*  
*Alice J. Luck*  
*clerk*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. 3772

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MARVIN L. LAMBETH, Individually,  
and d/b/a LAMBETH'S SERVICE  
STATION,

Plaintiff,

VS.

L. R. PHILLIPS,

Defendant.

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PLEAS.

FILED

APR 23 1959

ALICE J. DUCK, CLERK  
REGISTER

copy delivered 4-23-59

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 L. R. Phillips 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 the complaint of Marvin L. Lambeth, individually and doing business as Lambeth's Service Station.

Witness my hand this 24 day of February, 1959.

W. J. Hunk  
Clerk.

Exp. 3-20-59

MARVIN L. LAMBETH, individually and doing business as LAMBETH'S SERVICE STATION,

Plaintiff,

vs.

L. R. PHILLIPS,

Defendant.

X  
X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendant Two Hundred Dollars and 59/100 (\$200.59), due from him by account on the 8th day of January, 1959, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant Two Hundred Dollars and 59/100 (\$200.59), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant from December 28,

1958 to January 8, 1959, which sum of money, together with the interest thereon is still unpaid.

CHASON & STONE

By:

  
Attorneys for Plaintiff

✓ The Defendant resides on Alabama Highway 59 about 4 miles North of Loxley.

20900 3772

MARVIN L. LAMBETH, individually  
and doing business as LAMBETH'S  
SERVICE STATION,

Plaintiff,

VS.

L. R. PHILLIPS,

Defendant.

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SUMMONS AND BILL OF COMPLAINT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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FILED

FEB 23 1959

ALICE J. DUCK, (Clerk)

LAW OFFICES  
**CHASON & STONE**  
BAY MINETTE, ALABAMA

Delivered 25 day of Feb 1959  
on 25 day of March 1959  
received a copy of the within Doc

Service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By L. R. Phillips D. S.  
28 mi

Sheriff claims 28 miles at  
Ten Cents per mile Total \$ 2.80  
TAYLOR WILKINS, Sheriff  
BY L. R. Phillips  
DEPUTY SHERIFF