

MOBILE TILE CO., INC.,
A Corporation.

Plaintiff

-VS-

JAMES L. MOSLEY, also
known as Jim Mosley.

Defendant

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

3773

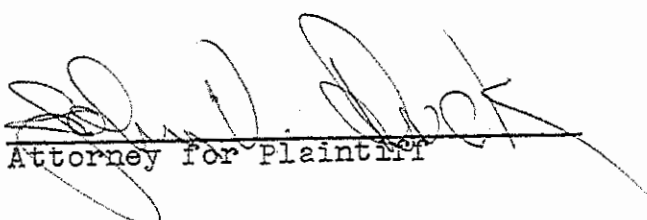
BILL OF COMPLAINT

COUNT ONE:

The Plaintiff claims of the defendant the sum of ONE THOUSAND EIGHT HUNDRED EIGHTY and 91/100(\$8,880.91)DOLLARS, due from him by account on the 29th day of July, 1958, which sum of money with the interest thereon, is still unpaid.

COUNT TWO:

Plaintiff claims of the defendant the sum of ONE THOUSAND EIGHT HUNDRED EIGHTY and 91/100(\$8,880.91)DOLLARS, on account stated between the Plaintiff and the defendant on the 1st day of December, 1958, which sum of money, with the interest thereon, is still unpaid.


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 JAMES L. MOSLEY, also known as

Jim Mosley

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 _____

James L. Mosley, also known as Jim Mosley, Defendant.____

by MOBILE TILE CO. INC._____

_____, Plaintiff.____

Witness my hand this 25 day of Feb 19 59

EX-4-8-59

Recept. 4-8-59, Clerk

No. 3773

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

MOBILE TILE CO., INC.

Plaintiffs

vs.

JAMES L. MOSLEY,

ALSO KNOWN AS JIM MOSLEY

633 Jim Mosley Defendants

Summons and Complaint

Filed

FILED

19

FEB 25 1959

Clerk

ALICE J. DUCK, CLERK
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Fairhope, Alabama

Received In Office

2/25 1959

Sheriff

I have executed this summons

this

H-8

1959

by leaving a copy with

James L. Mosley

Sheriff claims

Ten Cents per mile Total \$

20 miles at
2.00

BY

TAYLOR WILKINS, Sheriff
Edwige St. Aubert
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Edwige St. Aubert Deputy Sheriff

MOBILE TILE CO., INC.,
A Corporation.

Plaintiff

VS

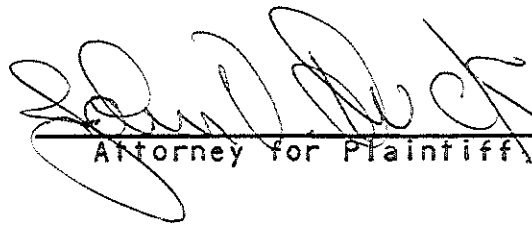
JAMES L. MOSLEY, also
known as Jim Mosley.

Defendant

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

AMENDED BILL OF COMPLAINT

Comes now the Plaintiff in the above styled cause and amends
it Bill of Complaint to read in every instance where numbers now
read (\$8,880.91) to read (\$1,880.91).


Attorney for Plaintiff

FILED

JUN 10

ALICE L. DUCK, CLERK
RECEIVED

MOBILE TILE CO., INC.,
A Corporation,

PLAINTIFF

VS

JAMES L. MOSLEY, also
known as JIM MOSLEY

DEFENDANT

* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA.
*
* AT LAW.
*
* CASE NO. 3773
*
*
*

Comes the Defendant in the above styled cause and for demurrer to the complaint filed in said cause and to each phase thereof separately and severally shows unto this Honorable Court as follows:

1.

As to count 1, that said count fails to state a cause of action.

2.

As to count 2, said count fails to state a cause of action.

3.

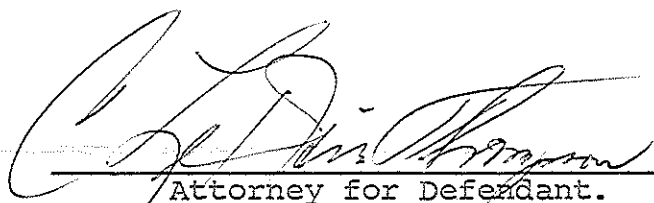
That the amount alleged in said count one is contradicted within the said count.

4.

That for aught alleged in said count two the amount claimed is contradicted within said count.

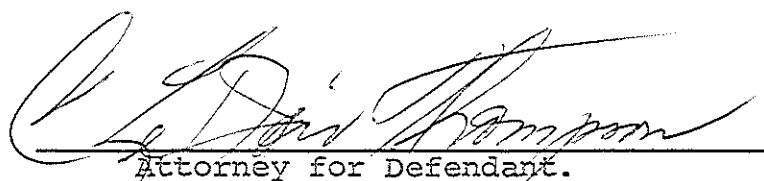
5.

That the amount alleged in counts one and two are indefinite and contradictory.


Attorney for Defendant.

Defendant demands a trial by jury in said cause.

Filed
April 23, 1959
Alice J. Duck
clerk


Attorney for Defendant.