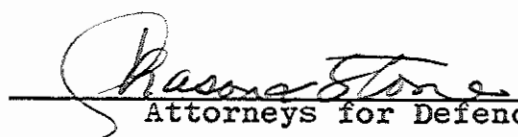


O. G. SORRELL,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	
	X	BALDWIN COUNTY, ALABAMA
DANA DUGGER and FLORENCE	X	
DUGGER,	X	AT LAW
Defendants.	X	

3903

Come the Defendants in the above styled cause and demur to the complaint filed in said cause and each and every court thereof, separately and severally, and assign the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That count "I" of the complaint fails to allege that the money claimed was due from the Defendants "by" account.
3. That count "I" of the complaint fails to allege that the money was due "on" the day set out therein.
4. That count "III" of the complaint does not allege that the work and labor was done for the Defendants by the Plaintiff at their request.
5. That such suit is against two Defendants but each count of the complaint is claimed against only one Defendant.
6. That the statement of account attached to the complaint affirmatively shows that such account is due Sorrell Plumbing & Heating and not the Plaintiff named in the suit.
7. That the affidavit attached to the complaint is made by O. G. Sorrell, the Plaintiff in the suit, and affirmatively shows that the account is due Sorrell Heating and Plumbing Company.
8. That the affidavit attached to the complaint affirmatively shows that O. G. Sorrell is the President of Sorrell Heating & Plumbing Company while the suit to which such affidavit is attached is brought in the name of O. G. Sorrell.


Attorneys for Defendants

3903

O. G. SORRELL,

Plaintiff,

vs.

DANNA DUGGER and FLORENCE DUGGER

Defendants.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

DEMURRER

* * * * *

FILED

AUG 12 1939

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

SUMMONS

STATE OF ALABAMA)
BALDWIN COUNTY)

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 Dana Dugger and Florence Dugger 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 O. G. Sorrell.

Witness my hand this 15 day of July, 1959.

E4-7-23-59

Allice J. Luck
CIRCUIT CLERK

COMPLAINT

O. G. SORRELL
PLAINTIFF
VS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

DANA DUGGER and FLORENCE
DUGGER
DEFENDANTS

I.

The Plaintiff claims of the Defendant Two Thousand Eight Hundred Sixty-Two Dollars (\$2,862.00), due from him on account, to wit: the 17th day of December, 1957, which sum of money, with interest thereon, is still unpaid.

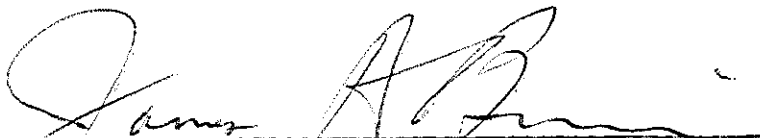
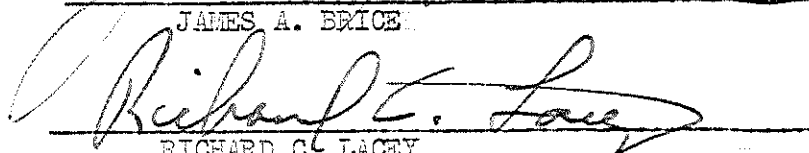
II.

The Plaintiff claims of the Defendant Two Thousand Eight Hundred Sixty-Two Dollars (\$2,862.00), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: December 17, 1957, which sum of money with interest thereon, is still unpaid.

III.

The Plaintiff claims of the Defendant Two Thousand Eight Hundred Sixty-Two Dollars (\$2,862.00), due from him for work and labor done for the Defendant by the Plaintiff on the 17th day of December, 1957, received by the Defendant to the

use of the Plaintiff which sum of money, with interest thereon is still unpaid.


JAMES A. BRICE

RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

There is attached hereto as Exhibit A and made a part hereof, an itemized statement of account verified by affidavit of O. G. Sorrell, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 17th day of December, 1957, and due at present.

The Defendant resides at Roley, Alabama.

FILED
JUL 15 1958
ALICE J. DYCK, Clerk

AFFIDAVIT

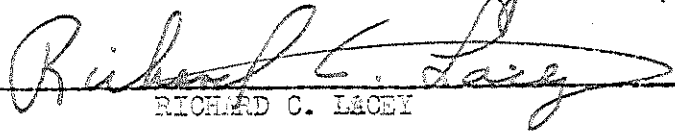
STATE OF ALABAMA)
BALDWIN COUNTY)

Before me, Richard C. Lacey, a Notary Public in and for said County in said State, personally appeared O. G. Sorrell, who, being by me first duly sworn, deposes and says that he is President of Sorrell Heating and Plumbing Company, Pensacola, Florida; that the annexed statement of the account of said Sorrell Heating and Plumbing Company against Dana Dugger and Florence Dugger is just, true and correct; that there is now due on said account the sum of \$2,862.00 Dollars after deducting all credits, set-offs or counterclaims.



O.G. SORRELL

Sworn to and subscribed before me this 9 day of July, 1959.



RICHARD C. LACEY

FILED
JUL 15 1959

ALICE J. DUCK, Clerk

STATEMENT

SORRELL

PLUMBING — HEATING

PHONES

HE 2-5124

HE 2-5125

P. O. Box 5065

3601 MOBILE HIGHWAY

PENSACOLA, FLA., 12/30/58 195

Dena & Florence Dugger

Foley, Alabama

I certify that this bill is correct and just and that
payment thereof has not been received.
SORRELL PLUMBING & HEATING, BY 

Labor & material furnished for the following
installations and alterations for residence
of Dena & Florence Dugger

One bathroom complete with tub, lavatory
and closet

One septic tank complete with 150' of drain
field

Straighten sagging roof & brace, redeck portion
of same & install new 215 lb. thick butt shingles
Approximate 2 ft. addition to South side of house

Install insulated siding on entire outside of
house

Sheetrock all inside walls of entire house except
living room, Pine panel inside walls of living
room

Install new inside doors through out the house

Install one new front door with glass insert

Screen entire front porch and install one screen
door

Temlock entire ceiling inside house

Total contract price for the above \$2862.00

Payments received .00

Balance due - - - - - \$2862.00

Received 16 day of July 1959

and on 23 day of July 1959

I served a copy of the within 5'92

on Dana Dugger 7-23-59

Florence Dugger 7-23-59

By service on _____

TAYLOR WILKINS, Sheriff

By [Signature] D.S.

Sheriff claims 144 miles at

Cents per mile Total \$ 14.40

TAYLOR WILKINS, Sheriff

BY [Signature] DEPUTY SHERIFF

SUMMONS 3903

DANA DUGGER and FLORENCE DUGGER

COMPLAINT

O. G. SORRELL

VS

DANA DUGGER and FLORENCE DUGGER

FILED

JUL 15 1959

ALICE J. DUCK, Clerk

LAW OFFICES OF
JAMES A. BRICE
RICHARD C. LACEY
FOLEY, ALABAMA