

LA NASA HARDWARE COMPANY, a
Corporation,

PLAINTIFF,

VS.

E. A. WALLACE,

DEFENDANT.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

CASE NO.

3944

DEMURRER

Now comes the Defendant in the above styled cause and for
demurrer to the Complaint assigns separately and severally the
following:

1. It does not state a cause of action.
2. The allegations of the Complaint are vague, indifferent
and uncertain.


ATTORNEY FOR DEFENDANT

Defendant demands trial of said
cause by Jury.


ATTORNEY FOR DEFENDANT

I certify that I have mailed a copy of the above Demurrer
to J. Connor Owens, Attorney for Plaintiff.


ATTORNEY FOR DEFENDANT

Filed
2-4-60

LA NASA HARDWARE COMPANY, a
Corporation,

PLAINTIFF,

VS.

E. A. WALLACE,

DEFENDANT.

IN THE CIRCUIT COURT OF

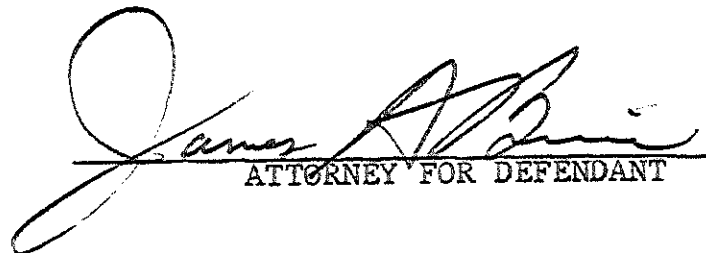
BALDWIN COUNTY, ALABAMA

AT LAW.

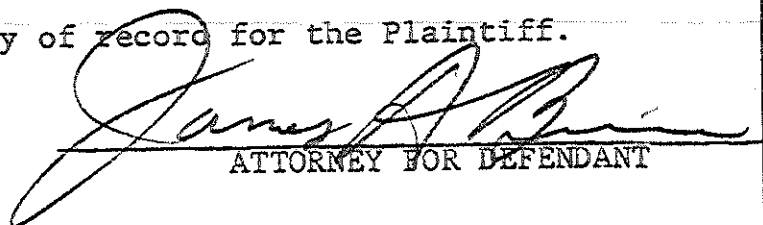
ANSWER

Comes the Defendant and for answer to the complaint
heretofore filed in this cause by the Plaintiff says:

1. Not Guilty.


ATTORNEY FOR DEFENDANT

I certify that a copy of this answer has been mailed
to J. Connor Owens, Attorney of record for the Plaintiff.


ATTORNEY FOR DEFENDANT

Filed
4-25-60

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.

..... AUGUST

..... TERM, 1959

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon E.A. WALLACE

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

E.A. WALLACE, Defendant...

by

LA NASA HARDWARE COMPANY, a Corporation,, Plaintiff...

Witness my hand this 20 day of August 1959.

[Signature] Clerk

No. _____ Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

LA NASA HARDWARE COMPANY,

A Corporation,

Plaintiff,

vs.

E. A. WALLACE,

Defendant,

Summons and Complaint

Filed _____ 19____

Clerk

J. CONNOR OWENS, JR.,

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19____

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

Sheriff

Deputy Sheriff

LA NASA HARDWARE COMPANY, a
Corporation,

Plaintiff,

vs.

E.A. WALLACE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

NO. _____.

COUNT I

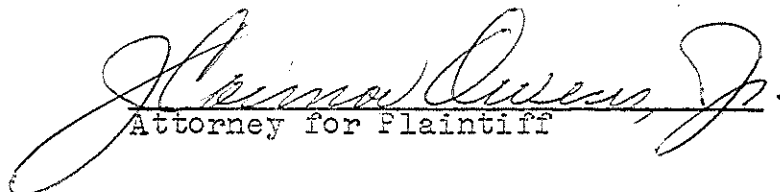
The Plaintiff claims of the Defendant the sum of \$434.28, due from him by account on the 28th day of August, 1958, which sum of money with interest thereon, is still unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of \$434.28, due from him on account stated between the Plaintiff and Defendant on the 28th day of August, 1958, which sum of money with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant \$434.28 due from ~~him for merchandise, goods and chattels sold by the Plaintiff~~ to the Defendant on the 1st day of August, 1958, which sum of money with interest thereon, is still unpaid.


Attorney for Plaintiff

The account sued on above is verified
by the Affidavit of the Plaintiff.

STATE OF LOUISIANA

Orleans PARISH

Before me the undersigned authority in and for said State and Parish, personally appeared _____, who is known to me and who, upon being duly sworn, did depose and say as follows:

My name is Earl Stonecypher and I am the Credit Manager of LaNasa Hardware Company, and that I am authorized to make this statement. That I have personal knowledge of the books, accounts and records of the LaNasa Hardware Company. That the said E.A. Wallace, whose address is Gulf Shores, Alabama, is indebted to LaNasa Hardware Company in the sum of \$ 434²⁸. That all just credits have been given the said E.A. Wallace, and that I have personal knowledge of the correctness of the amount due. That said amount is due, and has not been paid.

X Earl Stonecypher

Sworn to and subscribed before me this the 17th day of July, 1959.

Charles Schwartz, Jr.
Notary Public, Orleans
Parish, Louisiana

My commission expires at death

(AFFIX SEAL)

CHARLES SCHWARTZ, JR.
Notary Public, Parish of Orleans, State of La.
My Commission is issued for life.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN LAW

NO. 3944

LA NASA HARDWARE COMPANY,
a Corporation,

Plaintiff,

vs.

E.A. WALLACE,

Defendant.

SUMMONS AND COMPLAINT

LAW OFFICES OF
J. CONNOR OWENS, JR.
101 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA

*Defendant lives at Gulf
Shores Ala.*

Received 19 day of Aug 1959
and on 21 day of Jan 1960
I served a copy of the within on E.A. Wallace

By service on:

TAYLOR WILKINS, JR.
By [Signature]
Foley

Sheriff claims 72 miles at
en Cents per mile Total \$ 2.20
TAYLOR WILKINS, Sheriff
DEPUTY SHERIFF