

TELEPHONE WA 8-9836

LAW OFFICES

E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

P. O. BOX 71

May 25, 1960

Mrs. Alice Duck
Clerk of Circuit Court
Bay Minette, Alabama

3923

Inre: Campbell Hardware Supply
Company
VS: Dr. Theo Beilstein

Dear Mrs. Duck:

Enclosed find Plea of general issue. Please file.

Yours very truly,



EGR/wr

Enc:

cc: Mrs. Phyllis S. Nesbit
Attorney at Law
Robertsdale, Alabama

CAMPBELL HARDWARE SUPPLY
COMPANY, aCorporation

Plaintiff
VS
DR. THEO BIELSTEIN

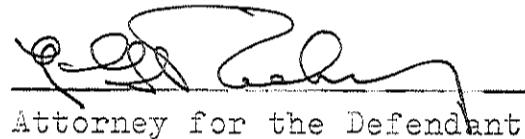
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Defendant

NO. _____

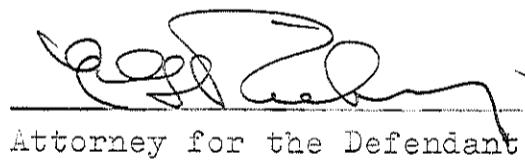
P L E A

Comes the Defendant in the above style cause and denies
each and every allegation of the Plaintiff's complaint and
demands strict proof of same.



Attorney for the Defendant

Note: The Defendant demands a trial by jury.



Attorney for the Defendant

*Filed
2-27-60*

SUMMONS

STATE OF ALABAMA

I IN THE CIRCUIT COURT OF

BALDWIN COUNTY

I BALDWIN COUNTY, ALABAMA

I AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Dr. Theo. Bielstein 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 the Campbell Hardware and Supply Company, a Corporation.

Witness my hand this 10 day of Sept., 1959.

Alice J. Duck
Alice J. Duck, Clerk

CAMPBELL HARDWARE AND SUPPLY
COMPANY, a Corporation

I IN THE CIRCUIT COURT OF

Plaintiff

I BALDWIN COUNTY, ALABAMA

VS

I AT LAW

DR. THEO. BIELSTEIN

I NO. _____

Defendant

I

1.

The Plaintiff claims of the defendant the sum of THREE HUNDRED SIXTY-THREE and 94/100 DOLLARS (\$363.94) due from him by account on, to-wit; 8th day of September, 1959, which sum of money with the interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is attached hereto as Exhibit "A" and made a part hereof.

2.

The Plaintiff claims of the defendant THREE HUNDRED SIXTY-THREE and 94/100 DOLLARS (\$363.94) due from him on account stated between the Plaintiff and the defendant on the 8th day of September, 1959, which sum of money, with the interest thereon, is still unpaid.

WILTERS, BRANTLEY AND YESBIT

BY: Charles S. Yesbit
Attorneys for the Plaintiff

Defendant's last known address
was Rural Fairhope, Alabama

EXHIBIT "A"

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Phillis L. Neelit a Notary Public, in and for said County and State, personally appeared WILLIAM WINGO, who being by me duly sworn, deposes and says, that he is President in the firm of CAMPBELL HARDWARE AND SUPPLY COMPANY, a corporation statement of the account of said firm against Dr. Theo. Bielstein of Fairhope, in the State of Alabama, is just, true and correct; that there is now due on said account the sum of \$363.94, after deducting all credits, set-offs or counter-claims.

CAMPBELL HARDWARE AND SUPPLY COMPANY

By William Wingo
As President

Sworn to and subscribed before me this 9th day of September 1959.

Phillis L. Neelit
Notary Public, State of Alabama at Large

Account of merchandise purchased by Dr. Theo. Bielstein August 26, 1957

Quantity	Description	Amount
1	1" plug	\$.19
1	1" union	.95
63 feet	1 $\frac{1}{4}$ " pipe	25.20
1	1 $\frac{1}{4}$ " union	1.35
1	1 $\frac{1}{4}$ " plug	.25
9 feet	1 $\frac{1}{4}$ " pipe	3.60
1	1 $\frac{1}{4}$ " slip union	2.75
9 feet	1" pipe	3.06
1	1" slip union	2.25
1	1" off-set nipple	.95
2	1" elbows	.70
1	1" tee	.50
84 feet	3" pipe	109.20
1	3" x 2" bushing	1.00
1	2" coupling	.75
1	2" x 6" nipple	.65
1	washer valve	3.60
1	wood plug	1.00
1	3" jet	32.50
1	casing adaptor	6.95
2	1 $\frac{1}{4}$ " elbows	1.46
1	1 $\frac{1}{4}$ " tee	1.10
		\$199.94
	Tax	6.00
		205.94
	92 feet well work	138.00
	setting pump	20.00
	Total amount due	\$363.94

FILED
SEP 10 1959

ALICE J. BUCK, Clerk

Received _____ day of _____
and on _____ day of _____ 19_____
I served a copy of the within
on _____

By service on _____

Sheriff claims

Ten Cents per mile Total \$
TAYLOR WILKINS, Sheriff
BY *Garnett*
DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff
By *L. C. Williams, D. S.*
Point Clear

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT
AT IAW

NO. 3972

CAMBELL HARDWARE AND SUPPLY
COMPANY, a Corporation

Plaintiff

vs

DR. THEO. BIELSTEIN

Defendant

Complaint

WILTERS, BRANTLEY AND NESBIT

FILED

SEP 10 1959

ALICE J. DUCK, Clerk