

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

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, a Corporation

Plaintiff

VS

DR. THEO BIELSTEIN

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

P L E A

Comes the Defendant in the above style cause and denies
each and every alligation 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

Plaintiff

I

IN THE CIRCUIT COURT OF

VS

I

BALDWIN COUNTY, ALABAMA

DR. THEO. BIELSTEIN

I

AT LAW

Defendant

I

NO. _____

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 NESBIT

BY: Charles S. Nesbit
Attorneys for the Plaintiff

Defendant's last known address
was Rural Fairhope, Alabama

EXHIBIT "A"

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Phillip S. Nesbit 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} that the annexed 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 WingoAs President

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

Phillip S. Nesbit
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 1/2" pipe	25.20
1	1 1/2" union	1.35
1	1 1/2" plug	.25
9 feet	1 1/2" pipe	3.60
1	1 1/2" 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	.63
1	washer valve	3.60
1	wood plug	1.00
1	3" jet	32.50
1	casing adaptor	6.95
2	1 1/2" elbows	1.46
1	1 1/2" tee	1.10
		\$199.94
	Tax	6.00
		205.94
	92 feet well work	133.00
	setting pump	20.00
	Total amount due	\$363.94

FILED
SEP 10 1959

ALICE J. DUCK, Clerk

Received 19 day of Sept 1959
and on 19 day of May 1960
I served a copy of the within 290
on W. O. Garner
By service on _____

TAYLOR WILKINS, Sheriff

By W. O. Garner D.S.

Paint Clear

Sheriff claims 80

Ten Cents per mile Total \$ 8.00

TAYLOR WILKINS, Sheriff

BY

Garner
DEPUTY SHERIFF

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT
AT IAW

NO. 3922

CAMDBELL 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