

CUNNINGHAM AND BOUNDS

ATTORNEYS AT LAW  
1350 DAUPHIN STREET  
P. O. BOX 4483

ROBERT T. CUNNINGHAM  
RICHARD BOUNDS

MOBILE, ALABAMA  
July 26, 1960

HEMLOCK 8-6188

Miss Alice Duck  
c/o Baldwin County Court House  
Circuit Court  
Bay Minette, Alabama

Re: Bender Welding and Machine Co.

vs  
Bryars Service Cleaners  
Case No. 3986

Dear Miss Duck:

Please dismiss the above case on motion of the Plaintiff.

Very truly yours,

CUNNINGHAM & BOUNDS



RICHARD BOUNDS

RB/baw

BENDER WELDING AND MACHINE  
COMPANY, INC., a corporation,

PLAINTIFF

VS

JANE DOE, individually and  
doing business as Bryars  
Service Cleaners,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

Comes the defendant in the above styled cause and demurring  
to plaintiff's complaint and each and every count thereof separately  
and severally says:

One: That it does not appear that the suit is brought  
in any legal court in Baldwin County, Alabama.

TWO: Said complaint does not state a cause of action.

THREE: Said complaint does not allege that the account  
sued on is due.

FOUR: Said complaint does not allege when the said  
account sued on is due.

FIVE: For ought that appears from the said complaint the  
account sued on is not due.

BEEBE & SWEARINGEN

BY *F. B. Swearingen*  
Attorneys for defendant

Defendant demands a trial by jury of the above styled cause.

BEEBE & SWEARINGEN

BY *F. B. Swearingen*  
Attorneys for defendant

FILED

OCT 21 1952

ALICE J. DUCK, Clerk



CUNNINGHAM AND BOUNDS

ATTORNEYS AT LAW

1350 DAUPHIN STREET

P. O. BOX 4483

MOBILE, ALABAMA

September 22, 1959

HEMLOCK 8-6188

ROBERT T. CUNNINGHAM  
RICHARD BOUNDS

Miss Alice Duck  
c/o Baldwin County Court House  
Circuit Court  
Bay Minette, Alabama

Dear Miss Duck:

May I ask you to file the enclosed bill of complaint in  
the Circuit Court.

Very truly yours,

CUNNINGHAM AND BOUNDS

*Richard Bounds*

RICHARD BOUNDS

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Enc. 2

BENDER WELDING AND MACHINE	:	IN THE CIRCUIT COURT OF
COMPANY, INC., a corporation,	:	BALDWIN COUNTY, ALABAMA
Plaintiff,	:	
vs.	:	
JANE DOE, individually and	:	
doing business as Bryars	:	
Service Cleaners,	:	
Defendant.	:	

COUNT ONE

Plaintiff claims of the defendant the sum of TWO HUNDRED SIXTY-EIGHT AND 94/100 (\$268.94) DOLLARS due from her by account on May 22, 1959, which sum of money with interest thereon, is still unpaid.

COUNT TWO

Plaintiff claims of the defendant the sum of TWO HUNDRED SIXTY-EIGHT AND 94/100 (\$268.94) DOLLARS on account stated between the plaintiff and the defendant on May 21, 1959, which sum of money with interest thereon, is still unpaid.

COUNT THREE

Plaintiff claims of the defendant the sum of TWO HUNDRED SIXTY-EIGHT AND 94/100 (\$268.94) DOLLARS for work and labor done at defendant's request prior to May 22, 1959, with interest thereon, is still unpaid.

CUNNINGHAM AND BOUNDS  
Attorneys for the Plaintiff

By: Richard Bounds  
RICHARD BOUNDS

Plaintiff avers that the true name of the owner of Bryar's Service Cleaners is unknown to the plaintiff, but the plaintiff believes that it is owned and operated by a Mrs. Bryars.

Richard Bounds  
RICHARD BOUNDS

Address of Defendant:

Bryars Service Cleaners  
Bay Minette, Alabama

or

c/o of her attorneys,  
Beebe and Swearingen  
Attorneys at Law  
Bay Minette, Alabama

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SEP 22 1950  
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SEP 22 1950

ALICE J. DUCK, CLERK  
REGISTER

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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 ~~Jane Doe, Individually and d/b/a Bryars Service~~  
~~Cleaners~~

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 ~~Jane Doe, Individually~~  
~~and d/b/a Bryars Service Cleaners~~ \_\_\_\_\_, Defendant \_\_\_\_\_

by Bender Welding and Machine Co., Inc. a Corp

\_\_\_\_\_, Plaintiff \_\_\_\_\_

Witness my hand this 23 day of Sept. 1959

Ex. 9-23-59

Alfred J. Aluch, Clerk

No. 3986

Page \_\_\_\_\_

The State of Alabama

Baldwin County

CIRCUIT COURT

BENDER WELDING AND MACHINE COMPANY  
INC. a corp

Plaintiffs

vs.

JANE DOE, individually and d/b/a

BRYARS SERVICE CLEANERS

Defendants

Summons and Complaint

Filed 9-23-59 19\_\_

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at \_\_\_\_\_

Received In Office

9/23 1959

\_\_\_\_\_, Sheriff

I have executed this summons

this Sept 25 1959

by leaving a copy with

Mr J F Byars

Taylor Wilkins Sheriff  
W. A. Talbert Deputy Sheriff  
o m c