

HERBERT LUNSFORD,
Plaintiff,

vs.

E. J. ENGEL AND GERHARDT
ENGEL,

Defendants.

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*
*

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

CASE NO. 4053

NOTICE OF DEPOSITION

TO: Mr. James A. Brice
Attorney at Law
P. O. Box 298
Foley, Alabama

Notice is hereby given that the Defendants in the above styled cause will take the pre-trial deposition upon oral examination of Mr. Jack Gendelman, whose address is 1425 South Western Avenue, Chicago 8, Illinois, in the law offices of Edwin M. Berman, Esquire, Attorney at Law, located at 134 North LaSalle Street, Chicago 2, Illinois, on Friday, February 26, 1960, at 3 o'clock p.m. pursuant to Act No. 375 of the General Legislative Session of the State of Alabama, 1955, as amended, before Charles B. McCorkle, Jr., a Notary Public, or before some other officer authorized by law to take depositions, said oral examination to continue from day to day until completed.

You are invited to attend and cross-examine.

DIAMOND, ENGEL & LATTOF
Attorneys for Defendants

BY:

I, Mylan R. Engel, one of the attorneys of record for the Defendants in the above entitled cause, do hereby certify that I have served a copy of the above and foregoing notice upon Hon. James A. Brice, attorney of record for the Plaintiff, by mailing a copy thereof to his office at P. O. Box 298, Foley, Alabama, by registered mail, return receipt requested, on this the 16th day of February, 1960.

FILED

FEB 17 1960

ALICE J. DUCK, Clerk

FILED
FEB 17 1960

ALICE J. DUCK, Clerk

4057

4053

C O M P L A I N T

HERBERT LUNSFORD,) IN THE CIRCUIT COURT OF
PLAINTIFF,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW.
E. J. ENGEL and GEBHARDT)
ENGEL,)
DEFENDANTS.

COUNT I

The Plaintiff claims of the Defendants Three Thousand Four Hundred One and No/100 (\$3,401.00) Dollars due from them by account on the 6th day of October, 1958, which sum of money with the interest thereon is still unpaid.

COUNT II

The Plaintiff claims of the Defendants Three Thousand Four Hundred One and No/100 (\$3,401.00) Dollars for merchandise, goods and chattels sold by the Plaintiff to the Defendants on the 25th day of June, and the 3rd, 4th, 5th, 10th, 11th, 12th, 14th, 15th and 16th day of July, respectively, in the year 1958, which sum of money with the interest thereon is still unpaid.

FILED

NOV 17 58

ALICE J. DUCK, CLERK
REGISTER

JAMES A. BRICE

RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

SUMMONS AND COMPLAINT

Baldwin Times

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 E. J. ENGEL and GEBHARDT ENGEL

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. J. ENGEL and
GEBHARDT ENGEL, Defendant S.....

by HERBERT LUNSFORD, Plaintiff.....

Witness my hand this 17 day of Nov 19...59

Reinhold J. Luck Clerk

FILED 11-19-59

RECORDED

No. 4053

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

HERBERT LUNSFORD

Plaintiffs

vs.

E. J. ENGEL and GEBHARDT

ENGEL

Defendants

SUMMONS and COMPLAINT

FILED

Filed 19.....

NOV 17 1959

ALICE J. DUCK, CLERK
REGISTER

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

19.....

Sheriff

I have executed this summons

this 11/19, 1953

by leaving a copy with

E. J. Engel
Gebhardt Engel

Sheriff claims 120 miles at

Ten Cents per mile Total \$ 12.00
TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff

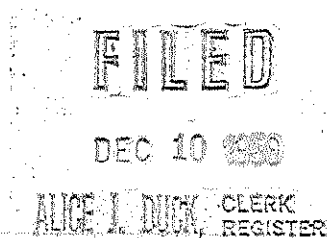
Deputy Sheriff

Announcement

HERBERT LUNSFORD,	*	IN THE CIRCUIT COURT OF
Plaintiff,	*	BALDWIN COUNTY, ALABAMA.
vs.	*	
E. J. ENGEL and GERHARDT	*	AT LAW
ENGEL,	*	CASE NO. 4053
Defendants.	*	

For answer to Plaintiff's complaint, heretofore filed
in said cause and to each Count thereof, separately and severally,
Defendants say:

1. The allegations of the complaint are untrue.



DIAMOND, ENGEL & LATTOF
Attorneys for Defendants

BY 
Member Appearing