

GEORGE H. BECKER  
PLAINTIFF  
VS  
MALCOLM D. ANDREWS  
DEFENDANT

( )  
) IN THE CIRCUIT COURT OF  
)  
) BALDWIN COUNTY, ALABAMA,  
)  
) AT LAW  
) NO. 4076  
)

Comes now the Defendant in the above styled cause and demurs to  
the Plaintiff's Complaint and for grounds therefor says:

1.

The Complaint fails to state a cause of action.

Wilters & Brantley

BY: William M Brantley  
Attorneys at Law

4076

GEORGE H. BECKER

PLAINTIFF

VS

MALCOLM D. ANDREWS

DEFENDANT

DEMURRERS

FILED

DEC 30 1959

ALICE J. DUCK, CLERK,  
REGISTER

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Malcolm D. Andrews to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of George H. Becker.

Witness my hand, this the 28 day of Nov, 1959.

Alice J. Duck  
CLERK

EX-12-16-59

GEORGE H. BECKER

Plaintiff

VS

MALCOLM D. ANDREWS

Defendant

) IN THE CIRCUIT COURT

) BALDWIN COUNTY, ALABAMA

) AT LAW

) NUMBER: \_\_\_\_\_

I

The Plaintiff claims of the Defendant TWO-THOUSAND TWO-HUNDRED SEVENTY-FOUR and SIXTY ONE-HUNDREDTHS (\$2274.60) DOLLARS due from him by promissory note made by him on the 16th day of July 1958 and payable to Fred Neumiller on the 16th day of January 1959, and the note was endorsed to the Plaintiff for value received by the said Fred Neumiller which note, with interest thereon, is still unpaid.

The Plaintiff further avers that the said note provided for a reasonable attorney's fee which same Plaintiff claims.

W. L. Hays  
Attorney for Plaintiff

FILED

NOV 28 1959

ALICE J. DUCK, CLERK  
REGISTER

Rt 1 Cor 183  
Daphne

NUMBER: 4076

GEORGE H. BECKER

Plaintiff

VS

MALCOLM D. ANDREWS

Defendant

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

FILED

NOV 28 1959

ALICE J. DUCK, CLERK  
REGISTER

Received 28 day of Nov 1959  
and on 16 day of Dec 1959  
served a copy of the within 20  
on Malcolm D. Andrews

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By Edlidge Steadman D. S.

Daphne, Ala

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

BY CPA  
DEPUTY SHERIFF