

RALSTON PURINA COMPANY,
a Corporation,

Plaintiff

- VS -

BALDWIN COUNTY FEED AND
SUPPLY COMPANY, INC.,
a Corporation,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 4116

COUNT ONE:

The Plaintiff claims of the Defendant \$8,828.92, due from it by account from the 28th day of August, 1959 to the 8th day of September, 1959, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant \$8,828.92, for merchandise, goods and chattels sold by the Plaintiff to the Defendant, from the 28th day of August, 1959 to the 8th day of September, 1959, which sum of money, with the interest thereon, is still unpaid.

Charles M. Bailey
ATTORNEY FOR THE PLAINTIFF

FILED

DEC 23 1959

ALICE J. DUCK, Clerk

4116
RALSTON PURINA COMPANY,
a Corporation,

Plaintiff

- VS -

BALDWIN COUNTY FEED AND
SUPPLY COMPANY, INC.,
a Corporation,

Defendant

BILL OF COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. _____

FILED

DEC 23 1959

ALICE J. DUCK, Clerk

May be served on
W. B. McKibbin Vice Pres.

Received 23 day of Dec 1959
and on 29 day of Dec 1959

I served a copy of the within Bill of Complaint
on Baldwin Co. Feed & Supply Co.

By service on W. B. McKibbin
Vice Pres

TAYLOR WILKINS, Sheriff

By Edleigh Steadham

Robertsdale, Ala

Sheriff claims 50 miles at

Ten Cents per mile Total 5.00

TAYLOR WILKINS, Sheriff

BY Edleigh Steadham
DEPUTY SHERIFF

RALSTON PURINA COMPANY,
a corporation,

Plaintiff,

vs.

BALDWIN COUNTY FEED AND SUPPLY
COMPANY, INC., a corporation,

Defendant.

Y
Y
Y
Y
Y
Y
Y
Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

DEMURRER

Comes the Defendant in the above styled cause and demurs to the complaint filed in said cause, and each and every count thereof, separately and severally, and assigns the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That "COUNT TWO" of said complaint does not allege that the money claimed by the Plaintiff is due from the Defendant.


Attorneys for Defendant

Defendant demands a trial of this
cause by jury.


Attorneys for Defendant

Filed 1-21-60

4116

RALSTON PURINA COMPANY,
Plaintiff

vs.

BALDWIN COUNTY FEED & SUPPLY
COMPANY, INC., a corporation,
Defendant.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

* * * * *

DEMURRER

* * * * *

FILED
JAN 21 1960
ALICE J. DUCK, CLERK
REGISTER

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA