

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon C. M. Northcutt, Jr. to appear within thirty days from service of this writ in the Circuit Court of Baldwin County, Alabama to be held for said county at the place of holding the same, then and there to answer the complaint of W. G. Andersen, doing business as Andersen Plumbing Company.

Witness my hand this 14 day of Jan., 1960.

Alice J. Duck
Alice J. Duck, Clerk

E-4-1-25-60
W. G. ANDERSEN, doing business as
ANDERSEN PLUMBING COMPANY

Plaintiff

VS

C. M. NORTH CUTT, JR.

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4129

1.

The Plaintiff claims of the defendant ONE THOUSAND ONE HUNDRED THIRTY-TWO and 41/100 DOLLARS (\$1,132.41) due from the defendant on account stated between the Plaintiff and the Defendant on, to-wit, the 1st day of January, 1960, which sum of money, together with the interest thereon, is still due and unpaid.

2.

The Plaintiff claims of the defendant ONE THOUSAND ONE HUNDRED THIRTY-TWO and 41/100 DOLLARS (\$1,132.41) due from him by account on to-wit, the 1st day of January, 1960, which sum of money, with the interest thereon, is still unpaid.

WILTERS, BRANTLEY AND NESBIT

BY:

Phyllis S. Nesbit
ATTORNEYS FOR THE PLAINTIFF

Defendant can be served
at his rural home near
Robertsdale.

FILED

JAN 14 1960

Alice J. Duck, Clerk

Received 14 day of Jan 1960
id on 25 day of Jan 1960
served a copy of the within
C. M. Northcutt, Jr.

service on _____
TAYLOR WILKINS, Sheriff
By Headman D. S.

Rosemont, Ala

Sheriff claims 52 miles at
Ten Cents per mile Total \$ 5.20
TAYLOR WILKINS, Sheriff
BY CC
DEPUTY SHERIFF

Today

STATE OF ALABAMA
BALLWIN COUNTY
IN THE CIRCUIT COURT
AT LAW
NO. 4122
W. G. ANDERSEN, doing business as
ANDERSEN PLUMBING COMPANY
Plaintiff
VS
C. M. NORTHCUTT, JR.
Defendant
COMPLAINT
WILTERS, BRANTLEY AND NESBIT
Attorneys for Plaintiff

FILED
JAN 14 1960
ALICE J. DUCK, Clerk

W. G. ANDERSEN, doing business as
ANDERSEN PLUMBING COMPANY

Plaintiff

VS

C. M. NORTHCUTT, JR.

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4129

NOTION TO REVIVE

Now comes Fronie C. Andersen, as executrix of the Last Will and Testament of the plaintiff, W. G. Andersen, deceased, and shows unto the court that the plaintiff, W. G. Andersen, departed this life on, to-wit: the 27th day of February, 1960, and Fronie C. Andersen has been duly appointed executrix of the last will and testament of the said W. G. Andersen, deceased, and has qualified as such.

Wherefore, Fronie C. Andersen, as executrix aforesaid, moves that this cause be revived as to W. G. Andersen, by the substitution of Fronie C. Andersen, as executrix of the last will and testament of W. G. Andersen, deceased, as plaintiff.

FILED
JUN 21 1960
ALICE I. DUCK, CLERK
REGISTER

Fronie C. Andersen
Fronie C. Andersen

Executrix of Last Will and Testament
of W. G. Andersen, Deceased

NO. 4129

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

W. G. ANDERSEN, doing business as
ANDERSEN PLUMBING COMPANY

Plaintiff

VS.

C. M. NORTHCUTT, JR.

Defendant

NOTION TO REVIVE

FILED

JUN 21 1960

ALICE J. DUCK, CLERK
REGISTER

WILTERS, BRANTLEY AND NESBIT
Attorneys for Plaintiff

W. G. ANDERSEN, doing business as
ANDERSEN PLUMBING COMPANY,
Plaintiff,

vs

C. M. NORTHCUTT, JR.,
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

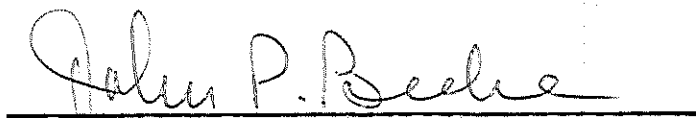
No. 4129

Comes the Defendant in the above entitled cause and for answer to the complaint filed therein says that the allegations of the complaint are untrue.


Attorney for Defendant

The Defendant demands trial by jury.

I hereby certify that I have on this the 24th day of February, 1960, sent a true and exact copy of the foregoing answer by United States Mail, postage prepaid, to Messrs. Wilters, Brantley and Nesbit, attorneys of record for the Plaintiff.


Attorney for Defendant

Filed
2-22-60

FRONIE C. ANDERSEN, As
Executrix of the Last Will
and Testament of W. C.
Andersen, Deceased,
Plaintiff,

vs

C. M. NORTHCUTT, JR.,
Defendant.


IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA


AT LAW

No. 4129

Comes the Defendant in the above entitled cause and
re-files answer to the complaint filed therein and says that the
allegations of the complaint are untrue.


Attorney for Defendant

I hereby certify that I have on this the 21st day of June,
1960, sent a true and exact copy of the foregoing answer by United
States Mail, postage prepaid, to Messrs. Wilters, Brantley & Nesbit,
Robertsdale, Alabama, attorneys of record for the Plaintiff.


Attorney for Defendant

Filed
6-22-60

[Handwritten signature]

FILED
JUN 22 1960
CLERK, REGISTER
MILWAUKEE

[illegible][illegible]

JOHN P. BEEBE
ATTORNEY AT LAW
ROBERTSDALE, ALABAMA

February 24th, 1960

Mrs. Alice J. Duck, Clerk,
Circuit Court, Baldwin County,
Bay Minette, Alabama.

Dear Mrs. Duck:

I enclose original copy of answer to be filed in the case of Andersen vs. Northcutt, being No. 4129. I have mailed a copy of this answer to the attorneys for the plaintiff.

Please note that a jury is demanded.

Yours very truly,

John P. Beebe