

UNIT STOVE & FURNACE COMPANY,
a Corporation,

Plaintiff,

-vs-

ROBERTSDALE HARDWARE COMPANY,
a partnership composed of J.
T. HADEN and C. L. MATHEWS
and J. T. HADEN and C. L. MAT-
HEWS, individually,

Defendants.

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Come the Defendants in the above styled cause, and for
answer to the Complaint filed in said cause, and to each and every
count thereof, separately and severally, say:-

FIRST:

That the allegations of the Complaint are untrue.

Hyatt, Heard & Pason
Attorneys for Defendants.

Defendants demand trial of
this cause by Jury.

Hyatt, Heard & Pason
Attorneys for Defendants.

UNIT STOVE & FURNACE COMPANY,
a Corporation,

Plaintiff,

vs.

ROBERTSDALE HARDWARE COMPANY,
a partnership composed of J. T.
Haden and C. L. Mathews, and J.
T. Haden and C. L. Mathews, in-
dividually,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

Comes the Plaintiff in the above styled
cause and demurs to the Defendant, J. T. Haden's, pleas 1-3,
inclusive, separately and severally, and, as grounds there-
for, sets down and assigns the following separate and sev-
eral grounds, to-wit:

FIRST: Said plea states no defense to
Plaintiff's cause of action.

SECOND: Said plea does not allege that
Plaintiff accepted C. D. Sweat's agreement to pay Defendant
J. T. Haden's debt.

THIRD: Said plea does not allege that
the debt, owed by the Defendant J. T. Haden to the Plaintiff,
was extinguished.

Doris K. Gray
ATTORNEYS FOR PLAINTIFF.

RECORDED

Filed June 25/932
T. M. Milverton
Clerk

STATE OF ALABAMA, :
COUNTY OF BALDWIN. :

TO ANY SHERIFF OF THE STATE OF ALABAMA...GREETING:

You are hereby commanded to summon ROBERTSDALE HARDWARE COMPANY, a partnership composed of J. T. HADEN and C. L. MATHEWS, and J. T. HADEN and C. L. MATHEWS, individually, to appear before the Circuit Court of said County, at the place of holding the same, within thirty days from the service of this writ, then and there to answer the complaint of UNIT STOVE & FURNACE COMPANY, a Corporation, hereto attached.

WITNESS my hand this the 21 day of April, 1932.

W. R. R. R. (CLERK)

UNIT STOVE & FURNACE COMPANY,
a Corporation,

Plaintiff,

vs.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

ROBERTSDALE HARDWARE COMPANY,
a partnership composed of J. T.
HADEN and C. L. MATHEWS, and
J. T. HADEN and C. L. MATHEWS,
individually,

Defendants.

COUNT ONE: Plaintiff claims of the Defendants the sum of Fifty Dollars (\$50.00), due from them by promissory note made by them on the 30th day of October, 1931, and payable thirty days after date, which sum of money, with the interest thereon from date at the rate of 8% per annum, is still due and unpaid.

COUNT TWO: Plaintiff claims of the Defendants the sum of Fifty Dollars (\$50.00), due from them by promissory note made by them on the 30th day of October, 1931, and payable sixty days after date, which sum of money, with the interest thereon from date at the rate of 8% per annum, is still due and unpaid.

COUNT THREE: Plaintiff claims of the Defendants the sum of One Hundred Dollars (\$100.00), due from them by promissory note made by them on the 30th day of October, 1931, and payable ninety days after date, which sum of money, with the interest thereon from date at the rate of 8% per annum, is still due and unpaid.

Plaintiff avers that in and by the terms of the notes hereinabove sued upon in Counts One, Two and Three, the Defendants agreed to pay all cost of collecting, securing or attempting to collect or secure said note, including a reasonable attorneys' fee, which Plaintiff claims, to-wit, Fifty Dollars (\$50.00).

Plaintiff admits a credit of \$76.27 on the notes hereinabove sued upon.

W. R. R. R.
ATTORNEYS FOR PLAINTIFF

Original
RECORDED

Unit Stove and Furnace Co
a Corporation
vs

Robertsdale Hardware Co, a part-
nership composed of J.T. Haden
and C.L. Mathews, and J.T. Haden
and C.L. Mathews, Individually.

Filed May 21, 1932.

W. H. ...
--Clerk.

Dozier & Gray.
Atty's for Plff.

Executed May
26th 1932 by serving
Copy of within
Summons & Complaint
on R. L. Mathews as
Manager of Robertsdale
Hdw Co. and Copy
on J. T. Haden and
C. L. Mathews. Individually
W. H. ...
Sheriff

Entered on docket 3/16/33

UNIT STOVE & FURNACE
COMPANY, a corporation,

Plaintiff,

vs.

ROBERTSDALE HARDWARE COM-
PANY ET AL.,

Defendants.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA. AT LAW.

And now comes the defendant in the above styled cause,
J. T. Haden, and for answer to the plaintiff's complaint, and to
each Count thereof, separately and severally, says:

FIRST:

The facts therein are untrue.

SECOND:

That he has paid the debt, for the recovery of which this
suit was brought, before the action was commenced.

THIRD:

That he, with the knowledge of the plaintiff, on, to-wit,
April 1st, 1932, transferred or sold all his right, title and inter-
est in and to the Robertsdale Hardware Company, a copartnership, to
one C. D. Sweat, who assumed and agreed to pay the indebtedness of
the said Robertsdale Hardware Company, and to hold the defendant,
J. T. Haden, free from any liability on contracts executed by the
Robertsdale Hardware Company, or accounts owed by the said company.

Beale & Stace
Attorneys for defendant,
J. T. Haden.

RECORDED

Wink Stove & Furnace Co

vs

J. P. Haden, et al

Answer of J. P. Haden

Filed June 16, 1932

P. W. Haden
Clerk