

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

November 18, 1960

4494

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re: Bon Secour Fisheries, Inc.
Vs: Earl Blackwell

Dear Mrs. Duck:

I enclose summons and complaint for plaintiff.

The defendant does business at Foley, Alabama and
may be served there.

Sincerely,


James A. Brice

JAB:j

BON SECOUR FISHERIES, INC.,
a corporation,

Plaintiff

vs

EARL BLACKWELL, individually and
d/b/a Gulf Fish Market
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

Comes the Defendant, in the above styled cause, and demurs to the Bill of Complaint heretofore filed therein, and to each count thereof separately and severally and as ground therefore shows separately and severally the following:


I

That the complainant does not state a cause of action.

II

That count I of the complainant is vague, uncertain and indefinite.

FILED
DEC 27 1960
ALICE J. DUCK, CLERK
REGISTER


Attorney for Defendant

SUMMONS

STATE OF ALABAMA
COUNTY OF BALDWIN

)
)
)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

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

You are hereby commanded to summons Earl Blackwell, individually and d/b/a Gulf Fish Market, to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of Bon Secour Fisheries, a corporation.

Witness my hand this 21 day of November, 1960.

Atty. J. Duck
Clerk

COMPLAINT

BON SECOUR FISHERIES, INC.,

a corporation,

PLAINTIFF

vs

EARL BLACKWELL, individually and
d/b/a Gulf Fish Market

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

I

The plaintiff claims of the defendant Two Thousand Eight Hundred Six and 22/100 (\$2,806.22) Dollars, due from him on account, to-wit: the 24th day of June, 1960, which sum of money, with interest thereon, is still unpaid.

II

The plaintiff claims of the defendant Two Thousand Eight Hundred Six and 22/100 (\$2,806.22) Dollars, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: the 24th day of June, 1960, which sum of money, with interest thereon, is still unpaid.

James A. Duck
Attorney for Plaintiff

FILED

NOV 21 1960

MARCE J. DUCK, Clerk

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

BON SECOUR FISHERIES, INC., A
CORPORATION, Plaintiff

vs
EARL BLACKWELL, individually and
d/b/a GULF FISH MARKET Defendant

SUMMONS AND COMPLAINT

Filed 1960

NOV 21 1960

ELICE J. DUCK, Clerk

Clerk

James H. Price, Plaintiff's Atty.

Defendant's Atty.

Foley, Alabama

Received In Office

11/21

1960

Sheriff

I have executed this summons
this 28th day of November, 1960

by leaving a copy with

Earl Blackwell

72 miles at 720

CC

Angelo Wilkins, Sheriff

Earl Blackwell

DS

Foley

BON SECOUR FISHERIES, INC.

COMPLAINT

Clerk

Witness my hand this 21 day of November, 1960.

Secy.

Where to answer the complaint of Bon Secour Fisheries, a corporation
within thirty (30) days from service of this process, then and
come to be held for said court at the place of holding same.

And if you fail to appear before the Circuit

you are hereby commanded to answer Earl Blackwell, individually

JO VMA SHERIFF OF THE STATE OF ALABAMA

COUNTY OF BALDWIN
STATE OF ALABAMA

SUMMONS

AT LAW
BALDWIN COUNTY, ALABAMA
IN THE CIRCUIT COURT OF