

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon LONNIE STEWART, doing business as the BEACHCOMBER, to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, Alabama, at the place of holding same by CLYDE WEIR.

Witness my hand this the 20 day of July, 1960.

Alfred J. Duck
Clerk

* * * * *

COMPLAINT

CLYDE WEIR,
PLAINTIFF

VS:

LONNIE STEWART, doing business
as BEACHCOMBER,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

4327

COUNT I:

The plaintiff claims of the defendant TWO HUNDRED FIFTY & 00/100 DOLLARS (\$250.00), due from him by account on, to wit: the 1st day of September, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant TWO HUNDRED FIFTY & 00/100 DOLLARS (\$250.60), due from him on account stated between the plaintiff and the defendant on, to wit: the 1st day of September, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant TWO HUNDRED FIFTY & 00/100 DOLLARS (\$250.00), due from him for work and labor done for defendant by plaintiff during the spring and summer of the year, 1959, at his request, which sum of money, with interest thereon, is still unpaid.

There is attached and made a part hereto an affidavit and accounting by said CLYDE WEIR dated the 15th day of July, 1960.

Alfred J. Duck
Attorney for Plaintiff

The defendant's address is:

Gulf Shores, Alabama

FILED

JUL 20 1960

ALFRED J. DUCK, CLERK
REGISTER

AFFIDAVIT

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

CLYDE WEIR, first being duly sworn, deposes and says as follows:

About April, 1959 my stepfather, George Nittolo, and Lonnie Stewart of Gulf Shores, and I went into a business known as the Beachcomber, as a partnership. We soon learned that there was not sufficient business or income for three of us, so I was requested to leave the partnership and the other two partners, Lonnie Stewart and George Nittolo, agreed orally to pay me \$50.00 a week for the time I worked at the motel and I worked at least thirteen weeks. The two partners agreed that they owed me \$650.00 and they paid me at the rate of \$100.00 per week, a total of \$400.00 and there remains an unpaid balance of \$250.00. At a later date my stepfather, George Nittolo sold his interest in the Beachcomber Motel to Lonnie Stewart, who assumed all of the debts.

Lonnie Stewart owes me \$250.00, plus at least one year's interest.

Clyde Weir
Clyde Weir

Sworn and subscribed to before
me this the 15th day of July, 1960.

Myrtle Louise Weir
Notary Public
Baldwin County, Alabama

No. 4324

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CLYDE WEIR,
PLAINTIFF
VS:
LONNIE STEWART, doing business
as BEACHCOMBER,
DEFENDANT

SUMMONS AND COMPLAINT

Received 20 day of July 1960
and on 26 day of July 1960
I served a copy of the within B.C.C.
on Lonnie Stewart

By service on
TAYLOR WILKINS, Sheriff
Carlisle Wilkins
Gulf Shores

Sheriff claims 100 miles at
Ten Cents per mile Total \$ 10.00
TAYLOR WILKINS, Sheriff
BY C.C.
DEPUTY SHERIFF

FILED
JUL 20 1960
JULICE L. DUCK, CLERK
REGISTER


LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

PLAINTIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

LONNIE STEWART, doing business
 as BEACHCOMBER,
 DEFENDANT

FILED
AUG 19 1960
AUG 1 1960
CLERK
REGISTER


Richard C. Lacey
ATTORNEY FOR DEFENDANT

RICHARD C. LACEY

POST OFFICE BOX 41

ATTORNEY AT LAW
GULF SHORES, ALABAMA

TELEPHONE YO 8-5261

August 18, 1960

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

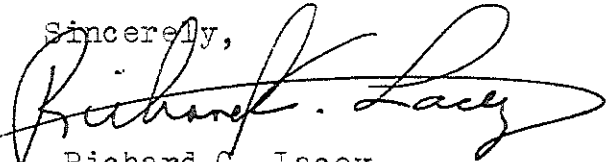
Re: Clyde Weir

VS: Lonnie Stewart

Dear Mrs. Duck:

I am enclosing defendant's answer in subject
cause. Please file same before the 20th of August.

Sincerely,



Richard C. Lacey

RCL:LL