

BROOKS & GARRETT
ATTORNEYS AT LAW
BREWTON, ALABAMA

LEON G. BROOKS
BROOK G. GARRETT
JOE B. THOMPSON, JR.

February 13, 1961

4574

Mrs. Alice J. Duck
Clerk of the Circuit Court
Bay Minette, Alabama

In-Re: Charles D. Bonner, etc.,
vs. Cecil S. Jones.

Dear Mrs. Duck:

We enclose to be filed a plea on behalf of the defendant in this cause. We are sending a copy of this to Messrs. Wilters & Brantley, attorneys for the plaintiff.

Yours very truly,

BROOKS & GARRETT

BY

Leon G. Brooks

LGB/nml

Enc. 1

CHARLES D. BONNER, DOING BUSINESS) IN THE CIRCUIT COURT OF
AS BONNER'S AERIAL APPLICATORS,) BALDWIN COUNTY, ALABAMA.
PLAINTIFF,)
VS.)
CECIL S. JONES,)
DEFENDANT.)

Comes the defendant and appears specially and pleads and says that this cause should be abated for that it was improperly brought in Baldwin County, Alabama, as the defendant had at the time of the filing of this suit and has at this time a permanent place of residence in the State of Alabama, said place of residence being Escambia County, Alabama; and that this being an action on a contract he must be sued in Escambia County, Alabama.

Cecil S. Jones
Defendant

THE STATE OF ALABAMA,)
ESCAMBIA COUNTY.)

Before the undersigned authority this day personally appeared Cecil S. Jones, who being first duly sworn, deposes and says that he is the defendant in the above styled cause and that the facts set forth in the foregoing plea are true.

Cecil S. Jones

Sworn to and subscribed before me this 11th day of February, 1961.

FILED
FEB 15 1961
ALICE L. DUCK, CLERK
REGISTER

Henry G. Bloor
Notary Public

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Cecil S. Jones to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Charles D. Bonner, d/b/a Bonner's Aerial Applicators.

Witness my hand, this 31 day of Jan, 1961.

Alice J. Buck
Clerk

CHARLES D. BONNER, d/b/a
BONNER'S AERIAL APPLICATORS,

Plaintiff

VS

CECIL S. JONES,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

The Plaintiff claims of the Defendant \$623.70, due from him by account on the 23rd day of August, 1960, which sum of money, with the interest thereon, is still unpaid.

Wilters & Brantley

By: Larry J. Wilters Jr.

The Defendant resides in

Brewton, Alabama

FILED

JAN 31 1961

ALICE J. BUCK, Clerk

702
Bellville, Ave

4574

CHARLES D. BONNER, d/b/a
BONNER'S AERIAL APPLICATORS,

Plaintiff

VS

CECIL S. JONES,

Defendant

Summons & Complaint

FILED

JAN 31 1961

ALICE J. DUCK, Clerk

Executed this 7 day
Feb 1961 by serving
a copy of the within.
S + C

for Cecil S Jones
Y S Brown
Sheriff

