

STATE OF ALABAMA
BALDWIN COUNTY

4156

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JAMES M. CAMPBELL 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 T. W. Cooper & Son, a partnership composed of Ted W. Cooper and Quentin Cooper.

WITNESS my hand this 27 day of Jan, 1960.

Alice J. Duck
Clerk

| | | |
|---------------------------|----|--------------------------|
| T. W. COOPER & SON, A |) | |
| PARTNERSHIP COMPOSED OF |) | |
| TED W. COOPER AND QUENTIN |) | IN THE CIRCUIT COURT OF |
| COOPER, |) | BALDWIN COUNTY, ALABAMA, |
| |) | |
| PLAINTIFFS |) | AT LAW |
| |) | |
| VS |) | |
| |) | |
| JAMES M. CAMPBELL |) | |
| |) | |
| DEFENDANT |) | |
| |) | |
| |) | |
| | 1. | |

The Plaintiffs claim of the Defendant SIXTEEN HUNDRED THIRTY NINE and 18/100 (\$1639.18) DOLLARS due from him by account on the 12th day of December, 1959, which sum of money with the interest thereon, is still unpaid.

FILED
JAN 27 1960
ALICE J. DUCK, Clerk

Wilters & Brantley
BY: [Signature]
Attorneys for the Plaintiff

4156

T. W. COOPER & SON, A
PARTNERSHIP COMPOSED OF
TED W. COOPER AND QUENTIN
COOPER,

PLAINTIFFS

VS

JAMES M. CAMPBELL

DEFENDANT

BILL OF COMPLAINT

FILED

JAN 27 1960

ALICE J. DUCK, Clerk

Received 27 day of Jan 1960
and on 10 day of Feb 1960
I served a copy of the within 2 cc
on James M. Campbell

By service on _____

TAYLOR WILKINS, Sheriff
By Edleigh Steadham D. S.

Rosinton, Ala

Sheriff claims 52 miles at

Ten Cents per mile Total \$ 5.20

TAYLOR WILKINS, Sheriff

BY Taylor Wilkins
DEPUTY SHERIFF

Rosinton

T. M. COOPER & SON,
a partnership composed of
Ted W. Cooper and Quentin
Cooper,
Plaintiffs,

vs

JAMES M. CAMPBELL,
Defendant.

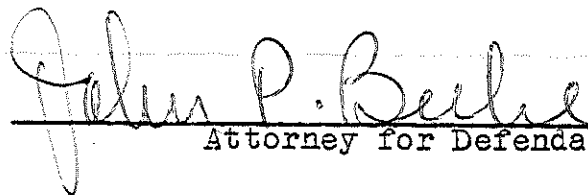
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

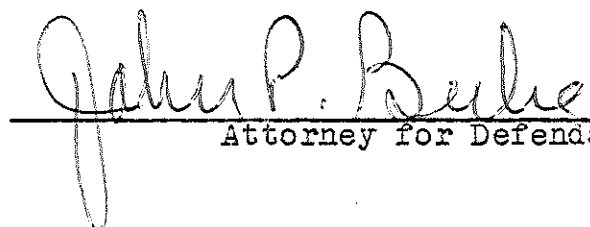
No. _____

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 27th day of Feb-
ruary, 1960, sent a true and exact copy of the foregoing answer by
United States Mail, postage prepaid, to Messrs. Wilters & Brantley,
Bay Minette, Alabama, attorneys of record for the Plaintiffs.


Attorney for Defendant

JOHN P. BEEBE
ATTORNEY AT LAW
ROBERTSDALE, ALABAMA

February 27th, 1960

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

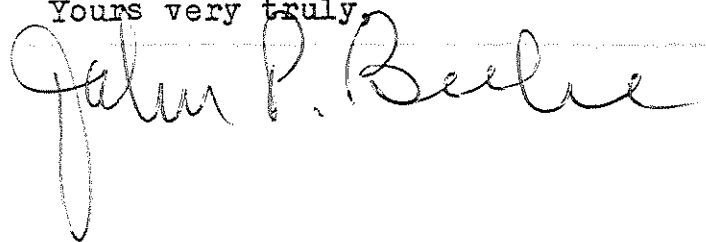
Dear Mrs. Duck:

I enclose answers of the defendant to be filed in the
following cases:

Loxley Tractor Company vs James M. Campbell;
T. M. Cooper & Son, vs James M. Campbell.

Please note that a jury has been demanded in both cases.
Copies of these answers have been mailed to the attorneys of record
for the plaintiffs.

Yours very truly,

A handwritten signature in cursive script, reading "John P. Beebe". The signature is written in dark ink and is positioned below the typed name "John P. Beebe".