

ALEX S. BERTOLLA, ANGELO F.
BERTOLLA, JOHN P. BERTOLLA
and RUDOLPH F. BERTOLLA,
partners, doing business as
A. BERTOLLA and SONS,

Plaintiffs,

vs.

JAMES CAMPBELL,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER 4185

NOTICE OF TAKING DEPOSITION UPON ORAL EXAMINATION

TO: HON. PHYLLIS S. NESBIT, ATTORNEY AT LAW, ROBERTSDALE, ALABAMA,
ONE OF THE ATTORNEYS FOR THE PLAINTIFFS IN THE ABOVE STYLED
CAUSE:

Please take notice that the deposition of Viola Bertolla,
whose address is Loxley, Alabama, will be taken upon oral examination
on Wednesday, August 24, 1960, at 9:00 A. M. before Louise Dusenbury,
a Notary Public in and for the State of Alabama at large, who is here-
by designated as the officer before whom such deposition shall be
taken, at her office in the courthouse at Bay Minette, Baldwin County,
Alabama.

Dated this the 10th day of August, 1960.

CHASON & STONE

By: [Signature]
Attorneys for Defendant

I, Norborne C. Stone, Jr., one of the attorneys of record
for the Defendant in the above styled cause, do hereby certify that
I have this day mailed a copy of the foregoing Notice of Taking Depo-
sition Upon Oral Examination to Hon. Phyllis S. Nesbit, one of the
attorneys of record for the Plaintiffs, postage prepaid and properly
addressed to her at her office in Robertsdale, Alabama.

Done this the 10th day of August, 1960.

FILED

AUG 11 1960

ALICE J. DOUGLASS, CLERK
REGISTER

[Signature]

ALEX S. BERTOLLA, ANGELO F.
BERTOLLA, JOHN P. BERTOLLA
and RUDOLPH F. BERTOLLA,
partners, doing business as
A. BERTOLLA and SONS,

Plaintiff,

VS.

JAMES CAMPBELL,

Defendant.

* * * * *

NOTICE OF TAKING DEPOSITION
UPON ORAL EXAMINATION

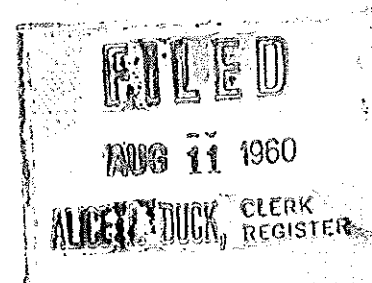
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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 4185

* * * * *



LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

ALEX S. BERTOLLA, ANGELO F.	X	
BERTOLLA, JOHN P. BERTOLLA	X	IN THE CIRCUIT COURT OF
and RUDOLPH F. BERTOLLA,	X	
partners, doing business as	X	
A. BERTOLLA and SONS,	X	BALDWIN COUNTY, ALABAMA
Plaintiffs,	X	
vs.	X	AT LAW
JAMES CAMPBELL,	X	
Defendant.	X	NUMBER 4185
	X	

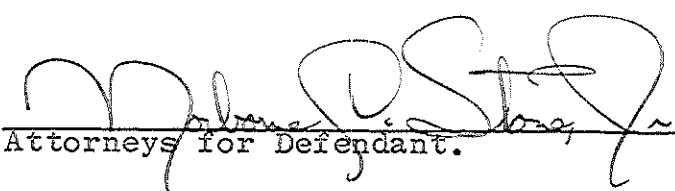
REQUEST FOR ISSUANCE OF SUBPOENA

TO: ALICE J. DUCK, CLERK OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA:

Request is hereby made by the undersigned as attorney for the Defendant in the above styled cause that you issue a subpoena duces tecum to Viola Bertolla whose address is Loxley, Alabama, to be and appear at the office of Louise Dusenbury in the courthouse at Bay Minette, Baldwin County, Alabama, on Wednesday, August 24, 1960, at 9:00 A. M. for the purpose of having her deposition upon oral examination taken by the Defendant; and to bring with her and produce at said time and place all books, records, memoranda, receipts, evidence of indebtedness and any and all other papers in her possession or custody or under her control concerning any transactions had between A. Bertolla & Sons and J. M. Campbell during the period of time from January 1, 1950, to-date.

Done this the 10th day of August, 1960.

CHASON & STONE

By: 
Attorneys for Defendant.

FILED

AUG 11 1960

ALICE J. DUCK, CLERK
REGISTER

ALEX S. BERTOLLA, ANGELO F.
BERTOLLA, JOHN P. BERTOLLA
and RUDOLPH F. BERTOLLA,
partners, doing business as
A. BERTOLLA and SONS,

Plaintiffs,

vs.

JAMES CAMPBELL,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

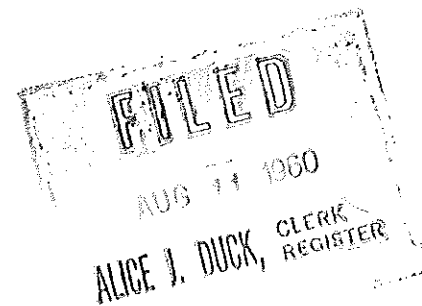
AT LAW

NO. 4185

* * * * *

REQUEST FOR ISSUANCE OF
SUBPOENA

* * * * *



LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

SUMMONS

STATE OF ALABAMA

○

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

BALDWIN COUNTY, ALABAMA

AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons James Campbell 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 Alex S. Bertolla, Angelo F. Bertolla, John P. Bertolla and Rudolph F. Bertolla.

Witness my hand this 16 day of February, 1960.

Alice J. Duck, Clerk

ALEX S. BERTOLLA, ANGELO F. BERTOLLA
JOHN P. BERTOLLA, and RUDOLPH F.
BERTOLLA, Partners, doing business as
A. BERTOLLA AND SONS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

Plaintiffs

AT LAW

VS

NO. 2185

JAMES CAMPBELL

Defendant

1.

The Plaintiffs claims of the defendant the sum of THREE THOUSAND TWO HUNDRED DOLLARS (\$3,200.00) due by a promissory note executed under seal and made by him on the 23rd day of June, 1954 and payable on the 1st day of November, 1954 together with interest thereon to date. The Plaintiff avers that the defendant agreed in said promissory note to pay all expenses, including reasonable attorney's fees, incurred in collecting the same and the Plaintiffs claims a reasonable attorney's fee in the amount of FIVE HUNDRED DOLLARS (\$500.00).

WILTERS, BRANTLEY AND NESBIT

BY:

Defendant may be served
at Loxley, Alabama

FILED

FEB 16 1960

ALICE J. LUBIN, UGIA

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT

AT LAW

NO. 4185

Received 16 day of Feb. 1960
and on 21 day of April 1960
I served a copy of the within Complaint
on James Campbell

By service on _____

ALEX S. BERTOLLA, ANGELO F. BERTOLLA
JOHN P. BERTOLLA, and RUDOLPH F.
BERTOLLA, Partners, doing business
as A. BERTOLLA AND SONS

Plaintiffs

VS

JAMES CAMPBELL

Defendant

TAYLOR WILKINS, Sheriff
By Ed High Stordham, S.
Sheriff claims 5 miles at

Ten Cents per mile Total \$ 5.20
TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF
Rosulov, ala

COMPLAINT

FILED

FEB 16 1960

ALICE J. DUCK, Clerk

WILTERS, BRANTLEY AND NESBIT

ALEX S. BERTOLLA, ANGELO F.
BERTOLLA, JOHN P. BERTOLLA
and RUDOLPH F. BERTOLLA,
partners, doing business as
A. BERTOLLA and SONS,

Plaintiffs,

vs.

JAMES CAMPBELL,

Defendant.

X

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER 4185

PLEAS:

Comes now the Defendant in the above styled cause, by
his attorneys, and for answer to the Complaint heretofore filed against
him pleads as follows:

1. The allegations of the Complaint are untrue.

2. The Defendant, for further answer to the Complaint,
saith that the note upon which the action was founded, was not exe-
cuted by him, or by any one authorized to bind him in the premises;
and he makes oath that this plea is true.

Respectfully submitted,

CHASON & STONE

By: 

Attorneys for Defendant

The Defendant respectfully demands a
trial of this cause by a jury.

CHASON & STONE

By: 

Attorneys for Defendant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Redus M. Akers a Notary Public,

in and for said County in said State personally appeared James Camp-
bell who is known to me and who, after being by me first duly and

legally sworn, did depose and say under oath as follows:

That his name is James Campbell and he is the Defendant in the above styled cause and he has read the foregoing pleas and the facts alleged therein are true and correct.

James Campbell
James Campbell

Sworn to and subscribed before me
this 5th day of May, 1960.

Robert M. Skers
Notary Public, Baldwin County, Ala.

My Commission expires Sept. 10, 1960

FILED
MAY 13 1960

ALICE L. DUCK, Clerk

4185'

July

FILED

MAY 13 1960

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA