

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA

4240

You are hereby commanded to summon C. M. Northcutt 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 same, then and there to answer the complaint of Baldwin County Feed & Supply Company, Inc., *a Corporation*

Witness my hand this the 22 day of April, 1960.

Alfred Duke
Clerk

BALDWIN COUNTY FEED &
SUPPLY COMPANY, INC.,
a Corporation
Plaintiff,

vs.

C. M. NORTHCUTT,
Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Seven Hundred and Sixteen Dollars and Three Cents (\$716.03) due from him by account on, to-wit: the 31st day of October, 1959, which sum of money with the interest thereon is still unpaid.


COUNT TWO:

The Plaintiff claims of the Defendant the further and additional sum of Four Hundred and Forty-five Dollars and Thirteen Cents (\$445.13) due from him by account on, to-wit: September 23, 1959, which sum of money with the interest thereof is still unpaid.

COUNT THREE:

The Plaintiff claims of the Defendant the sum of One Thousand One Hundred and Sixty-one Dollars and Sixteen Cents (\$1,161.16) due from him on account stated between the Plaintiff and the Defendant on, to-wit: October 31, 1959, which sum of money with interest thereon

is still unpaid.


Attorneys for Plaintiff

Defendant's address is
Robertsdale, Alabama

FILED
APR 22 1960
ALICE J. DUCK, CLERK
REGISTER

and on the 2nd day of April 1960
I served a copy of the within JCC
on C. M. Northcutt

By service on _____

TAYLOR WILKINS, Sheriff
By Edlugh Steadman S.

Sheriff claims 52 miles at
Ten Cents per mile Total \$ 5.20
TAYLOR WILKINS, Sheriff
BY ED
DEPUTY SHERIFF

Rosintown, Ala

BALDWIN COUNTY FEED & SUPPLY
COMPANY, INC.
a Corporation
Plaintiff,

vs.

C. M. NORTHCUTT,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

FILED
APR 22 1960
ALICE J. DUCK, CLERK
REGISTER

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

BALDWIN COUNTY FEED & SUPPLY
COMPANY, INC.,

PLAINTIFF

VS

C. M. NORTHCUTT

DEFENDANT

)
IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA,

) AT LAW

) NO. 4240

)
Comes now the Defendant in the above styled cause and files this his
Plea in Abatement to the Complaint and each count thereof separately and
severally and for grounds thereof says:

1.

The Complaint fails to allege whether the Plaintiff is an individual,
partnership or corporation.

Wilters S& Brantley

BY: [Signature]

Attorneys for the Defendant

The Defendant demands a trial by jury.

Wilters & Brantley

BY: [Signature]

Attorneys for the Defendant

FILED

MAY 23 1960

ALICE J. DICK, Clerk

4-2-40

BALDWIN COUNTY FEED & SUPPLY
COMPANY, INC.,

PLAINTIFF

VS

C. M. NORTHCUTT

DEFENDANT

PLEA IN ABATEMENT

FILED

MAY 23 1960

ALICE J. DUCK, Clerk