

MOBILE TILE COMPANY, INC.,  
A Corporation,

PLAINTIFF  
VS.

C. M. NORTHCUTT, and  
FLORENCE NORTHCUTT, Jointly  
and Individually,

DEFENDANTS

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW  
NO. 4242

COUNT ONE

The Plaintiff claims of the defendants the sum of TWO THOUSAND  
THREE HUNDRED NINETY-ONE and 95/100 DOLLARS (\$2,391.95), due from  
them by open account on the 7th day of December, 1957, which sum of  
money, with the interest thereof, is still unpaid.

COUNT TWO

The Plaintiff claims of the defendants the sum of TWO THOUSAND  
THREE HUNDRED NINETY-ONE and 95/100 DOLLARS (\$2,391.95), for work  
and labor done for the defendants by the Plaintiff from on, to-wit:  
the 6th day of November, 1957, until on, to-wit: the 7th day of  
December, 1957, at their request, which sum of money, with the in-  
terest thereon, is still unpaid.

COUNT THREE

The Plaintiff claims of the defendants the sum of TWO THOUSAND  
THREE HUNDRED NINETY-ONE and 95/100 DOLLARS (\$2,391.95), on account  
stated between the plaintiff and defendants on the 17th day of March,  
1959, which sum of money, with the interest thereof, is still un-  
paid.

COUNT FOUR

Plaintiff claims of the defendants the sum ONE THOUSAND and  
no/100 DOLLARS, (\$1,000.00), due from the defendants by a check  
drawn by the defendants on the Central Baldwin Bank, Robertsdale,  
Alabama, in favor of the plaintiff, which check was duly presented,  
payment refused, and duly protested, which sum of money, with the  
interest thereon, is still unpaid.

  
Attorney for Plaintiff

Defendants reside at:

Rosinton, Alabama

**FILED**

APR 25 1960

**ALICE L. DUNN CLERK REGISTER**

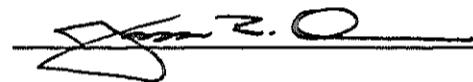
*Clyde L. Conway  
Farnam*

FROM THE LAW OFFICES OF  
**JOHN V. DUCK**  
FAIRHOPE, ALABAMA

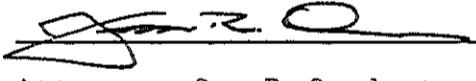
MOBILE TILE COMPANY, INC., )  
A Corporation, ) IN THE CIRCUIT COURT OF  
Plaintiff, )  
vs. ) BALDWIN COUNTY, ALABAMA  
C. M. NORTHCUTT and FLORENCE ) AT LAW. NO. 4242.  
NORTHCUTT, jointly and in- )  
dividually, )  
Defendants. )

Now come the Defendants in the above styled cause  
and for plea to the complaint heretofore filed in this cause  
and to each and every count thereof, separately and severally  
says:

1. The allegations of the said complaint are untrue.

  
\_\_\_\_\_  
Attorney for Defendants.

Defendants demand a trial of this cause by a jury.

  
\_\_\_\_\_  
Attorney for Defendants.

SUMMONS AND COMPLAINT

Moore Prg. Co.

The State of Alabama,  
Baldwin County.

Circuit Court, Baldwin County

No. \_\_\_\_\_

TERM, 19\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon C. M. NORTHCUTT, and FLORENCE NORTHCUTT,  
Jointly and Individually

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, State of Alabama, at Bay Minette, against \_\_\_\_\_

C. M. Northcutt and Florence Northcutt, Defendant\_\_\_\_\_,

by Mobile Tile Company, Inc., a Corporation \_\_\_\_\_

\_\_\_\_\_, Plaintiff\_\_\_\_\_,

Witness my hand this 25 day of

April 1960

Alice J. Dick, Clerk

No. 4244

Page \_\_\_\_\_

The State of Alabama  
Baldwin County

CIRCUIT COURT

MOBILE TILE CO., INC.,

A Corporation

Plaintiffs

vs.

C. M. Northcuff, and Forence  
Northcuff, Jointly and  
Individually Defendants

Defendants

Summons and Complaint

Filed

**FILED**

19

APR 25 1960

Clerk

**Alice L. Duck, Clerk  
REGISTER**

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rosinton, Ala.

\* Received In Office

4/25 1967

, Sheriff

I have executed this summons

this 5-17 1960

by leaving a copy with

C.M. Northcuff  
Florence Northcuff

104  
4244

Sheriff claims 10 miles at  
Ten Cents per mile Total \$ 10.00

TAYLOR WILKINS, Sheriff

BY

E.D.  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Ed Leigh Steadham Deputy Sheriff

Rosinton, Ala.

386 Fairhope Ave.

WA 8-8960

JOHN V. DUCK  
ATTORNEY AT LAW  
FAIRHOPE, ALA.

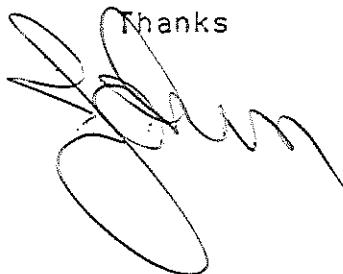
April 22, 1960

Mrs. Alice J. Duck  
Clerk of Circuit Court  
P. O. Box 239  
Bay Minette, Alabama

Dear Mrs. Alice:

Enclosed you will find a suit on open account. Please  
file.

Thanks

A handwritten signature in black ink, appearing to read "John V. Duck". To the right of the signature, the word "Thanks" is written in a smaller, printed-style font.

Mobile Ave 16 U. M. Courthouse

JURY LIST - SPRING SESSION - MARCH 13, 1961

1. Quinley, Lyman, Farmer, Bay Minette
2. Rider, Charles, Woodsman, Bay Minette
3. Riebe, Alfred, Farmer, Elberta
4. Roberts, Harry W., Motel Oper., Gulf Shores
5. Robertson, George F., Farmer, Robertsdale
6. Rush, Howard, Gov't. Emp., Montrose
7. Sanders, E. Frank, Banker, Foley
8. Shirley, Bud., Laborer, Eleanor
9. Sims, James F., Farmer, Rabon
10. Slaughter, Ashton B., Timberman, Tensaw
11. Slaughter, Dupree, Farmer, Tensaw
12. Byrne, Charles, Merchant, Foley
13. Bankester, Artie, Retired, Robertsdale
14. Britton, Charles, Creamery, Fairhope
15. Stokes, Carl B., Carpenter, Foley
16. Thomas, Jennings, Farmer, Foley
17. Underwood, Vaughn, Farmer, Foley
18. Wright, Justice D., Forester, Stapleton
19. Yarbrough, Clarence, Mechanic, Bay Minette
20. Younce, George, Farmer, Foley
21. Lindsey, James H., Abstrator, Bay Minette
22. Bott, Leonard, Farmer, Rosinton
23. Martin, Auburn W., Farmer, Stockton
24. McGowin, Randolph, Jr., Store Keeper, Bay Minette
25. Nassar, Emile J., Merchant, Bay Minette
26. Novoty, Milton J., Farmer, Robertsdale
27. Nye, Robert J., Plant Mer., Robertsdale
28. Phillips, Mayben, Farmer, Little River
29. Moore, Byrd L., Engineer, Fairhope
30. Mothershed, Lamar, Oil Distributor, Bay Minette
31. Cox, Young Ausphera, Merchant, Stockton
32. Gerhard, Cassebaum, Farmer, Elberta
33. Hinkelmann, Howard, Civil Service, Elberta
34. Hinote, Ben, Contractor, Bay Minette
35. Hoiles, Thomas E., Gulf Gas Agent, Robertsdale
36. Jones, Sanford, Newport, Bay Minette
37. Joyner, J.H., Jr., Grand Hotel, Fairhope
38. Keldorf, William E., County Emp., Elberta
39. Kendrick, Rivers, Farmer, Robertsdale
40. Klein, Raymond, Farmer, Fairhope
41. Lazzari, John, Farmer, Belforest
42. Haden, James T., Salesman, Robertsdale
43. Hansen, Calvin, Bell Telephone, Fairhope
44. Hairston, Robert R., Salesman, Elberta
45. Camp, Lester Daniel, Sanitation, Bay Minette
46. Goremz, Cecil, Brookley Field, Bay Minette
47. Conway, Clyde, Shipyard, Bay Minette

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