

BILL MALONE, Ind. and
d/b/a/ DELTA EXTERMINATING CO.
Plaintiff

VS

EDITH ~~DE~~ DEESE
Defendant

4/292
I IN THE CIRCUIT COURT OF
I BALDWIN COUNTY, ALABAMA
I AT LAW:
I
I

Count 1.

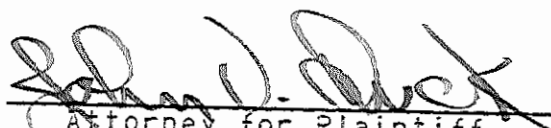
Plaintiff claims of the Defendant the sum of ONE HUNDRED AND THIRTY (\$130.00) DOLLARS, due from her by account on to-wit, May 17, 1960, which sum of money with the interest thereon is still unpaid.

Count 2.

Plaintiff claims of the Defendant ONE HUNDRED AND THIRTY (\$130.00) DOLLARS for work and labor done for the Defendant by the Plaintiff on to-wit the 17th day of May, 1960, at her request, which sum of money with the interest thereon is still unpaid.

Count 3.

The Plaintiff claims of the defendant ONE HUNDRED AND THIRTY (\$130.00) DOLLARS on account, stated between the Plaintiff and the Defendant on the 26th day of May, 1960, which sum of money with the interest thereon is still unpaid.


Attorney for Plaintiff

Defendant resides:

Spanish Fort Estates,
Daphne, Alabama

FILED

JUN 21-60

ALICE I. DUCK, CLERK
REGISTER

100
We the jury in this case ~~grant~~
~~judgment against Ethel V. Reese~~
find for the Plaintiff sum of
\$13.00

3/14/1961

E. H. V. Reese

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BILL MALONE, Ind. and
d/b/a DELTA EXTERMINATING CO.

Plaintiff

VS

EDITH V. DEESE

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4292

Comes now the Defendant in the above styled cause and for answer
to the Plaintiff's Complaint says as follows:

1.

1. That the allegations contained therein are untrue.

2.

1. That the allegations contained therein are untrue.

3.

1. That the allegations contained therein are untrue.

WILTERS, BRANTLEY AND NESBIT

BY:

Phyllis S. Nesbit
Attorneys for Defendant

The Defendant demands trial by Jury.

I hereby certify that I have on this the 28th day of June, 1960, sent
a true and exact copy of the foregoing answer by United States Mail, Postage
prepaid, to Mr. John V. Duck, Attorney of record for the Plaintiff.

WILTERS, BRANTLEY AND NESBIT

BY:

Phyllis S. Nesbit
Attorneys for Defendant

FILED
JUN 28 1960

ALICE J. DUCK, Clerk

NO. 4292

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

BILL MALONE, Ind. and
d/b/a DELTA EXTERMINATING CO.

Plaintiff

VS

EDITH V. DEESE

Defendant

FILED

JUN 28 1960

ALICE J. DUCK, Clerk

WILTERS, BRANTLEY AND NESBIT
Robertsdales, Alabama

BILL MALONE, Ind. and
d/b/a DELTA EXTERMINATING CO.

Plaintiff

VS

EDITH V. DEESE

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4292

Comes now the Defendant in the above styled cause and amends her
answer to the Plaintiff's complaint by adding the following plea:

4.

That the Defendant is not indebted to the Plaintiff in that the
Plaintiff had agreed for a consideration to exterminate termites and like
insects from the house and was to do this in a workmanlike manner and
had warranted that the house would be free of termites and like insects,
but in fact the work was not done in a workmanlike manner and there are
still termites and like insects in and under the house.

WILTERS, BRANTLEY & NESBIT

BY:

Phillip S. Nesbit
Attorneys for the Defendant

I hereby certify that I have on this the 10th day of September
1960, sent a true and exact copy of the foregoing answer by United States
Mail, Postage prepaid, to Mr. John V. Duck, Attorney of record for the
Plaintiff.

WILTERS, BRANTLEY & NESBIT

BY:

Phillip S. Nesbit
Attorneys for the Defendant

FILED

SEP 12 1960

ALICE J. DUCK, Clerk

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4292

BILL MALONE, Ind. and
d/b/a DELTA EXTERMINATING CO.

Plaintiff

VS

EDITH V. DEESE

Defendant

AMENDED ANSWER

John V. Duck
Attorney for Plaintiff

WILTERS, BRANTLEY & NESBIT
Attorneys for Defendant

FILED

SEP 12 1960

ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

Moore Ptg. 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 Edith V. Deese

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 Edith V. Deese
-----, Defendant-----

by-----

Bill Malone, Ind. and d/b/a Delta Exterminating Co., Plaintiff-----

Witness my hand this 21 day of June 1960

Reinhold, Clerk

No. 42-92 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

Bill Malone, Ind and
d/b/a Delta Exterminating Co.
Plaintiffs

vs.

Edith V. Deese

Defendants

Summons and Complaint

Filed FILED 19____

JUN 21 1960

ALICE L. DUCK, CLERK
REGISTER

Clerk

John V. Duck

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Spanish Fort Estates,
Daphne, Alabama

Received In Office

June 21 1960

_____, Sheriff

I have executed this summons

this 23 June 1960

by leaving a copy with

Edith V. Deese

Sheriff claims 44 miles or

John C. Taylor, Sheriff
TAYLOR, WILKINS, Sheriff

By Tanner

Taylor Wilkins Sheriff
W. O. Tanner Deputy Sheriff
Spanishfort