

The State of Alabama, }
BALDWIN COUNTY.

Circuit Court

No. _____

Spring Term 191 *9*

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon Rufus Walker

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 him Defendant.

by Louis Kaemmerer

Plaintiff

Witness my hand this 3rd day of February 191 9.

[Signature] Clerk.

COMPLAINT

Louis Kaemmerer,Rufus Walker,

Plaintiff Versus

Defendant.

The Plaintiff claims of the Defendant the sum of

One Hundred Fifty and 00/100 (\$150.00)----- Dollars ~~100.00~~

damages for the conversion by him, on the to-wit: Jan. 6th, 1918 of the following chattels One Hundred Fifty and 00/100 (\$150.00) the proceeds of a check, the property of the plaintiff.

The Plaintiff claims of the Defendant the sum of One Hundred Fifty and 00/100 (\$150.00) Dollars due by an instrument which is in words and figures as follows: Foley, Ala. Oct. 1918 No. 2. State Bank of Foley pay to the order of Rufus Walker \$150 One Hundred Fifty Dollars. For _____ Louis Kaemmerer.

Plaintiff claims of Defendant the sum of One Hundred Fifty and 00/100 (\$150.00) Dollars for money loaned by the plaintiff to the defendant on the to-wit: 6th day of Oct. 1918.

Plaintiff claims of the defendant the sum of One Hundred Fifty and 00/100 Dollars (\$150.00) due from him by account on the to-wit: 6th day of Oct. 1918, which sum of money with interest thereon is still due and unpaid.

PAGE & MOORE.

Plaintiff's Attorney.

125

ORIGINAL.

No.

State of Alabama,

BALDWIN COUNTY.

Circuit Court

Louis Kaemmerer

vs.

Plaintiffs

Rufus Walker

Defendants

SUMMONS AND COMPLAINT

Filed

1917

Clerk

Defendant lives at

Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette.

Received in office

1917

Sheriff

I have executed this Writ

this 1st day March 1917
by leaving a copy of the within summons and com-
plaint with

Rufus Walker.

Sheriff

Deputy Sheriff.

LOUIS KAEMMERER

VS

RUFUS WALKER

Defendant ~~is~~ for answer to the first count of complaint pleads that he did not convert the chattels described in said count as alleged.

For plea to the second count defendant says that the check described in said count was paid to him by plaintiff as part purchase price for a boat, which he is ready and willing to deliver when balance of purchase price is paid by plaintiff to defendant as he agreed to pay.

For answer to the third count of complaint defendant says that plaintiff did not ~~loan~~ him the sum of \$150.00 as alleged in said third count.

For answer to the fourth count of complaint defendant says that he is not indebted to plaintiff as alleged in said fourth count. Defendant demands a trial by jury of the issues in this case.

Stouffer Stouffer
Attys for Defendant.

2nd

Pleas of defendant

Filed May 5th. 1919

T. W. Richardson

Clk.

May 5th 1919