

B. L. POLK,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4643

~~Comes the defendant in the above entitled cause~~
and demurs to the complaint. and separately and severally
to each count thereof, and for grounds of demurrer, assigns,
separately and severally the following:

1. The count is vague, indefinite and uncertain.
2. It is not alleged with sufficient certainty as to what the merchandise, goods or chattels consisted of.
3. It is not alleged with sufficient certainty the quantity or price of the items sold to the defendant.
4. It is not alleged with sufficient certainty ~~the date from which the interest claimed is due.~~
5. The amount claimed due on the account as of the 10th day of March, 1961 is not set out and as referred to in the verified affidavit of that date.
6. The defendant was not served with a copy of the itemized statement and therefore is not informed of the items claimed to be sold to the defendant.

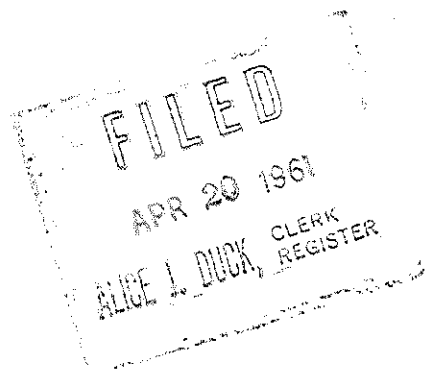
The Defendant Demands a
trial by Jury.

Arthur C. Ephraim
Attorney for the Defendant

Arthur C. Epperson
Attorney for the Defendant

I hereby certify that a copy
of this pleading was mailed to
Forest A. Christian on the 19th
day of April, 1961. Postage prepaid.

Arthur C. Epler
Attorney for the Defendant



COPY

FOREST A. CHRISTIAN
ATTORNEY AT LAW
FOLEY, ALABAMA

February 20, 1962

4643

Hon. Hubert M. Hall
Judge of Circuit Court
Bay Minette, Alabama

Dear Judge Hall:

Today on the jury docket, you called the case of Griffin vs Polk, it is at issue. This case was settled between the parties several months ago and therefore it is important that you mark the case settled between the parties and that it not appear on the jury docket, which may embarrass Mr. Polk.

With best wishes, I am,

Cordially yours,

ORIGINAL SIGNED
FOREST A. CHRISTIAN
FOREST A. CHRISTIAN

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon B. L. POLK, 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, Alabama, at the place of holding same by FRED C. GRIFFIN, doing business as GRIFFIN MOTOR SUPPLY.

Witness my hand this the 17 day of March, 1961.

Alice J. Duck
Clerk

EX-3-20-61
* * * * *

COMPLAINT

FRED C. GRIFFIN, d/b/a
GRIFFIN MOTOR SUPPLY,

PLAINTIFF

VS:

B. L. POLK,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant THREE HUNDRED NINETEEN & 84/100 DOLLARS (\$319.84), due from him by account on, to wit: the 11th day of July, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant THREE HUNDRED NINETEEN & 84/100 DOLLARS (\$319.84), due from him on account stated between the plaintiff and the defendant on, to wit, the 11th day of July, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant THREE HUNDRED NINETEEN & 84/100 DOLLARS (\$319.84), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit, the 11th day of July, 1960, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 10th day of March, 1961.

Julius Blum
Attorney for Plaintiff

The defendant's address is:

Foley, Alabama

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FILED

MAR 17 1961

ALICE J. DUCK, CLERK
REGISTER



STATEMENT

GRIFFIN MOTOR SUPPLY
DISTRIBUTORS

Automotive Parts, Equipment and Tires
LOXLEY, ALA.
PHONE WO 4-3412

B. I. PolkFoley, Alabama

TERMS: 2% 10th Prox. No Unpaid Accounts Increased After 20th Prox. Charges And Credits After The 25th Of The Month Will Appear On Next Month's Statement.

DATE	FOLIO	CHARGES	CREDITS	BALANCES
1960				
March 25	Statement Rend.			52.98
29	6348	16.58		
30	6565	16.87		
30	6368	28.29		114.72
April 6			52.98	61.74
6	6630	1.20		62.94
11	6762	6.61		69.55
15	6810	15.69		85.24
22	6888	7.14		92.38
27	6909	10.26		102.64
27	3101	8.39		
29	3122	1.55		112.58
27	CM132		1.13	111.45
May 6	3296	282.35		393.80
11	3222	1.86		395.66
June 6	3920	40.00		435.66
13			140.00	295.66
July 11	7310	24.18		319.84

STATE OF ALABAMA,)
BALDWIN COUNTY.)

I, FRED C. GRIFFIN, first being duly sworn, depose and say that this is the true and correct statement of account to the best of my knowledge after allowing all just credits


Fred C. Griffin

Sworn to and subscribed before
me this the 10th day of March,
1961

4-643
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

FRED C. GRIFFIN, d/b/a GRIFFIN
MOTOR SUPPLY,
PLAINTIFF

VS:

B. L. POLK
DEFENDANT

Received 17 day of March 1961
and on 20 day of March 1961
I served a copy of the within S & C
on B. L. Polk
By service on _____

TAYLOR WILKINS Sheriff
By Taylor Wilkins D. S.

12 miles at
Ten Cents per mile Total \$ 1.20
TAYLOR WILKINS, Sheriff
BY Childress
DEPUTY SHERIFF

FILED

MAR 17 1961

ALICE J. DUCK CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

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FOREST A. CHRISTIAN
FOLEY, ALABAMA