

TRAVIS L. BELCHER, d/b/a
Belcher Ambulance Sales,

Plaintiff,

VS.

FRED THRASHER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

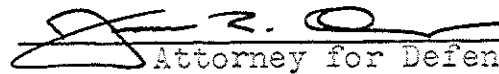
AT LAW

NO. 4699

PLEA

Now comes the Defendant in the above styled cause and
for plea to the complaint as last amended says:

1. Not guilty.
2. The allegations of the complaint are untrue.


Attorney for Defendant

FILED

NOV 27 1961

ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA
COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Fred Thrasher d/b/a Thrasher Funeral Home, to appear and Plead, Answer or Demur within thirty days to the Bill of Complaint filed in the Circuit Court of said County by Travis L. Belcher d/b/a Belcher Ambulance Sales as Plaintiff and against Fred Thrasher d/b/a Thrasher Funeral Home as Defendant.

Witness my hand this 10 day of May, 1961.

Bliss J. Cook
Clerk

64-5-15-61
Travis L. Belcher d/b/a
Belcher Ambulance Sales
Plaintiff
Vs
Fred Thrasher d/b/a
Thrasher Funeral Home
Defendant

In the Circuit Court of
Baldwin County, Alabama
At Law. No. _____

1.

The Plaintiff claims of the Defendant Two-Hundred Fifty Dollars for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit June 10, 1958, which sum of money with the interest thereon is still due and unpaid.

2.

The Plaintiff claims of the Defendant Two-Hundred Fifty Dollars due by stated account on to-wit June 10, 1958, with the interest thereon.

3.

The Plaintiff claims of the Defendant Two-Hundred Fifty Dollars as the purchase price of one old 1948-'49-or '50 Packard combination ambulance and Hearse, motor number 2213-2240, sold by the Plaintiff to the Defendant, on to-wit June 10, 1958, on time payments, which sum of money with the interest thereon is still due and unpaid.

Robert F. McQuilley
Attorney for the Plaintiff

Plaintiff demands a trial by Jury.

Robert F. McQuilley
Attorney for the Plaintiff

4699

Travis L. Belcher d/b/a
Belcher Ambulance Sales

Plaintiff

Vs

Fred Thrasher d/b/a
Thrasher Funeral Home

Defendant

Received 10 day of May 1961
and on 15 day of May 1961
served a copy of the within
on Fred Thrasher

by service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbert D. S.
5 mi

SUMMONS AND COMPLAINT

Belcher

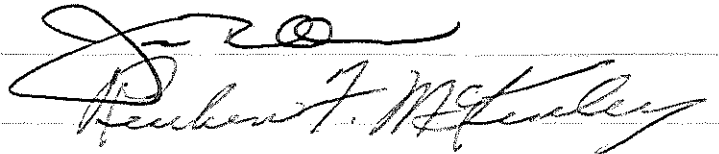
52

4699

Thresher

Please enter order :

" Settled between the parties and case
dismissed. Defendant taxed with costs."


Herbert F. McKinley

filed

3-12-62

Miss J. Whack
Clerk

TRAVIS L. BELCHER d/b/a
Belcher Ambulance Sales,

Plaintiff,

VS.

FRED THRASHER d/b/a
Thrasher Funeral Home,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

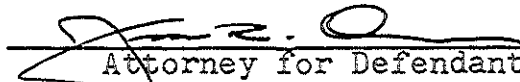
AT LAW

PLEA IN ABATEMENT

Now comes Fred Thrasher, Defendant in the above styled cause, and appears solely and specially for the purpose of filing this plea in abatement, and for no other purpose, and pleading in abatement, says:


That he is not now and was not on June 10, 1958, when this cause of action arose, doing business as Thrasher Funeral Home.


Wherefore, Defendant says that this suit should be abated, and should not be allowed to proceed.


Attorney for Defendant

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, within and for said State and County, personally appeared Fred Thrasher, who being duly sworn, deposes and says that he has read over the foregoing plea in abatement and that the facts stated therein are true.


Sworn to and subscribed before me
on this the 22nd day of May, 1961.


Notary Public, Baldwin County, Alabama.

FILED

MAY 23 1961

ALICE L. DUCK, CLERK
REGISTER

TRAVIS L. BELCHER d/b/a
Belcher Ambulance Sales,
Plaintiff,

VS.

FRED THRASHER d/b/a
Thrasher Funeral Home,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Now comes the Plaintiff and amends the complaint
heretofore filed in said cause by substituting Fred Thrasher
d/b/a Thrasher Brown Service, Funeral Home for Fred Thrasher
d/b/a Thrasher Funeral Home.


Attorney for the Plaintiff

4699
Travis L. Belcher d/b/a
Belcher Ambulance Sales,

Plaintiff,

Vs.

Fred Thrasher d/b/a
Thrasher Funeral Home,

Defendant.

AMENDMENT OF COMPLAINT

FILED
MAY 26 1961

ALICE J. DICK, CLERK
REGISTER

Travis L. Belcher d/b/a
Belcher Ambulance Sales

Plaintiff

Vs

Fred Thrasher d/b/a Thrasher
Brown Service Funeral Home

Defendant

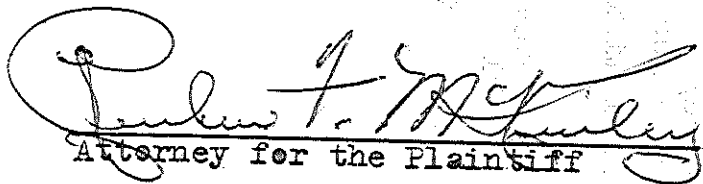
In the Circuit Court of
Baldwin County, Alabama
At Law. No. 4699

Now comes the Plaintiff and amends the style of this cause to
read "Travis L. Belcher d/b/a Belcher Ambulance Sales, Plaintiff
Vs Fred Thrasher, Defendant".

FILED

SEP 12 1961

ALICE I. DUCK, CLERK
REGISTER


Attorney for the Plaintiff

4699

Travis L. Belcher d/b/a
Belcher Ambulance Sales

Plaintiff

Vs

Fred Thrasher d/b/a Thrasher
Brown Service Funeral Home

Defendant

Amendment

FILED

SEP 12 1961

ALICE J. DUCK, CLERK
REGISTER

TRAVIS L. BELCHER d/b/a
Belcher Ambulance Sales,

Plaintiff,

VS.

FRED THRASHER d/b/a
Thrasher Brown Service,
Funeral Home,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

PLEA IN ABATEMENT

Now comes Fred Thrasher, Defendant in the above styled cause, and appears solely and specially for the purpose of filing this plea in abatement, and for no other purpose, and pleading in abatement, says:

That he is not now and was not on June 10, 1958, when this cause of action arose, doing business as Thrasher Brown Service, Funeral Home.

Wherefore, Defendant says that this suit should be abated, and should not be allowed to proceed.

Fred Thrasher
Defendant

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, within and for said State and County, personally appeared Fred Thrasher, who being duly sworn, deposes and says that he has read over the foregoing plea in abatement and that the facts stated therein are true.

Fred Thrasher

Sworn to and subscribed before me
on this the 15 day of June, 1961.

[Signature]
Notary Public, Baldwin County, Alabama

