

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John M. Parker and Amy T. Parker to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Lanier P. Angle.

WITNESS my hand this 26 day of May, 1961.

Alice J. Duck
Clerk

LANIER P. ANGLE,
Plaintiff,
VS.
JOHN M. PARKER, AND AMY T.
PARKER,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

4712

C O M P L A I N T
COUNT ONE

The Plaintiff claims of the Defendants Four Hundred Seventy-eight and 74/100 Dollars (\$478.74) due by promissory note made by them on the 12th day of October, 1960, and payable on demand, with interest thereon.

[Signature]
Attorney for Plaintiff

Defendants' address is
18 Fig Street
Fairhope, Alabama

FILED
MAY 26 1961
ALICE J. DUCK, Clerk

COMPLAINT

4712

LANIER P. ANGLE,

Plaintiff,

VS.

JOHN M. PARKER AND AMY T.
PARKER,

Defendants.

18 Fwy St.

Received 26 day of May 1961
and on 13 day of July 1961
I served a copy of the within
on John M. Parker and Amy
T. Parker
By service on

TAYLOR WILKINS, Sheriff
By Edmond T. Thomas

Fairhope, Ala

Sheriff claims 140 miles at

Ten Cents per mile Total \$ 14.00

TAYLOR WILKINS, Sheriff

BY

Stanham
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

MAY 126 1961

ALICE J. DUCK, Clerk

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

LANIER P. ANGLE,

Plaintiff,

VS.

JOHN M. PARKER and AMY P.
PARKER,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

MOTION TO STRIKE

Now comes the Plaintiff in the above styled cause and moves the Court to strike the answer or pleas heretofore filed in this cause by the said Defendants and as grounds for said motion assign the following separately and severally:

1. The said answer is unnecessarily prolix.
2. The said answer is irrelevant.
3. The said answer is frivolous.
4. The said answer is unnecessarily repeated.


Attorney for Plaintiff

FILED

AUG 10 1931

ALICE J. DUCK, CLERK
A. GISTER

LANIER P. ANGLE

Plaintiff

-VS-

JOHN M. PARKER, and

AMY P. PARKER

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

ANSWER:

Comes now the Defendants in the above styled cause, and for answer to the Bill of Complaint filed herein, says:

That the note sued on was executed by the Defendants under duress, in that they were threatened by the Plaintiff to withhold their income tax returns for the year 1959 unless and until they executed the said note sued on; thereby incurring penalties from the Federal and State Governments.

The Defendants for further answer sayeth that the Plaintiff had promised to make up their income tax returns for the year 1959 for the sum total of ONE HUNDRED SEVENTY-FIVE (\$175.00) DOLLARS and that subsequent thereto, the Plaintiff charged them the amount sued on under this note.

The Defendant, JOHN M. PARKER as a defense to the action of the Plaintiff, saith that at the time said action was commenced, the Plaintiff was indebted to him in the sum of ONE-HUNDRED and FIFTY-SIX and 05/100 (\$156.05) DOLLARS for work and labor done, at the Plaintiff's request, which he hereby offered to set off the demand of the Plaintiff.

John M. Parker
John M. Parker

Amy T. Parker
Amy T. Parker

STATE OF ALABAMA

BALDWIN COUNTY

Personally appeared before me, the undersigned authority JOHN M. PARKER, and AMY T. PARKER, the Defendants in the above styled cause, who being by me first duly and legally sworn doth depose and say that the matters and facts alleged therein are true and correct.

John M. Parker
John M. Parker

Amy T. Parker
Amy T. Parker

FILED

AUG 1 1961

CLERK
AUGUST 1, 1961
AUGUST 1, 1961
AUGUST 1, 1961

Sworn to and subscribed before me on this the 31st day of

July, 1961.

John V. Deak
Notary Public

NO. 4712

12/6/61 Referred to Alameda
County
18 June 1962

FILED
AUG 1 1961
ALICE J. DUCK, CLERK
REGISTER

LANIER P. ANGLE,

Plaintiff,

VS.

JOHN M. PARKER and AMY T.
PARKER,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

AMENDED COMPLAINT

Now comes the Plaintiff in the above styled cause and amends the complaint heretofore filed in said cause so that as amended the said complaint will read as follows:

"COUNT ONE

The Plaintiff claims of the Defendants Four Hundred Seventy-eight and 74/100 Dollars (\$478.74) due by a promissory note made by them on the 12th day of October, 1961, and payable on demand, with interest thereon. Plaintiff further avers that in and by the terms of said note the Defendants promised to pay a reasonable attorney's fee in the event it became necessary to file a suit for the collection of said note, which attorney's fee Plaintiff avers to be Seventy-five Dollars (\$75.00) and which he herewith claims.

/s/ JAMES R. OWEN

Attorney for Plaintiff"



Attorney for Plaintiff