

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

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**Index**

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53

218

SUMMONS AND COMPLAINT

Baldwin Times

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 EDMUND R. CIMINO, and FLORA BELLE CIMINO,  
Jointly and Individually

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 EDMUND R. CIMINO, and  
FLORA BELLE CIMINO, Jointly and Individually, Defendant.

by ROBERT J. BALES, and BESSIE K. BALES, Jointly and Individually

\_\_\_\_\_, Plaintiff.

Witness my hand this 18 day of July 1961

Ed - 7-20-61

Reid J. Spuck, Clerk

No. 4773

Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

ROBERT J. BALES, and BESSIE K.

BALES, Jointly and Individually

Plaintiffs

vs.

EDMUND R. CIMINO, and FLORA

BELLE CIMINO, Jointly and Ind.

Defendants

**SUMMONS and COMPLAINT**

Filed

**FILED**

19

**JUL 18 1961**

, Clerk

ALICE J. DUCK, CLERK  
REGISTER

John V. Duck

Plaintiff's Attorney

Defendant's Attorney

Defendant ~~times~~ at May be  
served at:  
Smart Shop, Bay Minette,  
Alabama

RECEIVED IN OFFICE

July 18, 1961

, Sheriff

I have executed this summons

this

July 20, 1961

by leaving a copy with

Edmund R. Cimino  
Flora Belle Cimino

Tracy Williams Sheriff

W. A. Albert Deputy Sheriff

O. M. M.

ROBERT J. BALES AND BESSIE K.  
BALES, Jointly and Individually,

Plaintiffs,

Vs

EDMUND R. CIMINO and FLORA  
BELLE CIMINO, Jointly and

Individually,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

No. 4775

DEMURRERS

Comes now the Defendants in the above styled cause, and for answer to the Complaint heretofore filed in this cause, and to each and every count thereof, separately and severally, says as follows:

-1-

The allegations fail to state a cause of action.

-2-

The allegations of the complaint are mere conclusions of the pleader.

-3-

The Complaint does not allege the exact amount of the alleged note.

-4-

The Complaint fails to allege how the Plaintiffs became holder of the alleged note upon which this suit is based.

Defendants demand a trial  
by Jury in this cause.

Kenneth Cooper  
Attorney for Defendants

Kenneth Cooper  
Attorney for Defendants

ATTORNEY OF RECORD FOR PLAINTIFF:

Hon John V. Duck  
Attorney at Law  
Fairhope, Alabama

