SCHUTTE AND WILLIAMS, a * IN THE CIRCUIT COURT OF partnership composed of GEORGE W. RANDALL, ROBERT I. * BALDWIN COUNTY, ALABAMA, WILLIAMS, and GEORGE OLSEN, * Plaintiff, * * FAIRHOPE MEMORY GARDENS, a corporation, * CASE NO. 5100

Comes now the defendant in the above captioned cause and for answer to the Bill of Complaint heretofore filed and to each and every count thereof separately and severally, says as follows:

- 1. Not guilty.
- 2. Not indebted as alleged.
- 3. That the promissory note sued upon was made without any legal consideration in that the defendant received nothing as a result of the promissory note and the plaintiff did not give up anything of value.

MAYER W. PERLOFF, Atty. for Defendant

Defendant respectfully demands a trial by jury.

Attorney for Defendant

FILED

MAY 2 1962

ALICE I. DUCK, CLERK
REGISTER

SCHUTTE AND WILLIAMS, A Partnership composed of GEORGE W. RANDALL, ROBERT I. WILLIAMS, and GEORGE OLSEN,

X IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

Plaintiff,

-vs-

CASE NO.

FAIRHOPE MEMORY GARDENS,

X

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A Corporation,

Defendant.

COUNT ONE

The Plaintiff claims of the Defendant Two Thousand Fifty (\$2,050.00) Dollars due from it by account from to-wit, April 9th, 1958 to to-wit, July 21st, 1960, which sum of money with the interest thereon is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant Two Thousand Fifty (\$2,050.00) Dollars due from it for work and labor done for the defendant by the plaintiff from to-wit, the 9th day of April, 1958 to to-wit, July 21st, 1960, at its request, which sum of money with interest thereon is still unpaid.

COUNT THREE

The Plaintiff claims of the Defendant Nine Hundred (\$900.00) Dollars, due from it by promissory note payable on demand, and demand having been made and the defendant having failed and refused to make payment and said payment now being due, which sum of money with the interest thereon is still unpaid.

Attorneys for the Plaintiff

Defendant may be served at:

Fairhope Memory Gardens Fairhope, Alabama

MAR 30 1962

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THE STATE OF ALABAMA,

BALDWIN COUNTY

	CIRCUIT	COURT,	BALDWIN	COUNT
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Fairhope Memory Gardens, a Corp.

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Plaintiff's Attorney Laylar Wilks	Sheriff
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LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS (1900-1957) SAM W PIPES, IST WALTER M. COOK FRANK T. POPE, JR CORDON B. KANN

IRWIN W. COLEMAN, JR

March 29, 1962

Honorable Alice J. Duck Clerk, Circuit Court Baldwin County, Alabama Bay Minette, Alabama

Re: Schutte & Williams v. Fairhope Memory Gardens

Dear Mrs. Duck:

We enclose herewith an original and one copy of a complaint of Schutte and Williams v. Fairhope Memory Gardens, a corporation. We respectfully request that you file the complaint and send us the extra copy marked filed.

Very truly yours,

LYONS, PIPES AND COOK

Gordon B. Kahn

GBK:mb

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OF BAY MINETTE

No. 327

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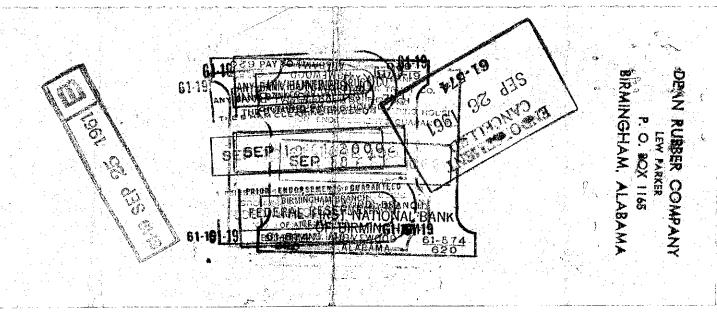
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