

WOLFE CIRCUIT COURT.

D. C. MILLER,

PLAINTIFF.

BRIEF OF "SNOW CHURCH & COMPANY"
VS:-
ON PLEA IN ABATEMENT.

SNOW-CHURCH COMPANY,

DEFENDANT.

This is an action instituted by D. C. Miller against "Snow-Church Company". Process was issued upon same, directing the sheriff to summons "Snow-Church Company" to answer. This process was sent to the Sheriff of Jefferson County, which reached him on November 4th, 1912, and on November 6th, 1912, he executed it upon W. T. Godfrey, President of the "Snow Church & Company", the return on the summons reading as follows:-

Executed November 6th, 1912, on "Snow-Church Company" by delivering a true copy of the within summons to W. Godshon, President of said Company, he being chief officer found in this county at this time.

A. M. Emler, S.J.C.
By, E. D. Waters, D. S."

There is no "W. Godshon," but the summons was actually executed upon W. T. Godfrey, President of "Snow Church & Company".

"Snow Church & Company" have now filed their special demurrer or plea to the jurisdiction and plea in abatement, in which they set forth the fact that W. T. Godfrey is the President of the "Snow Church & Company" and that the principal office and place of business of "Snow Church & Company" is Louisville, Kentucky, that it is a corporation