

SUMMONS AND COMPLAINT

STATE OF ALABAMA)

CIRCUIT COURT

BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mrs. Sadie B. Thompson to appear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of Watson Hardware Company, Inc., A Corporation.

Witness this 11 day of January, 1964.

Beving Duck
Clerk

C O M P L A I N T

WATSON HARDWARE COMPANY, INCORPORATED,)	IN THE CIRCUIT COURT OF
A CORPORATION,)	BALDWIN COUNTY, ALABAMA
PLAINTIFF,)	AT LAW
VS.)	FILE NUMBER <u>5898</u>
MRS. SADIE B. THOMPSON,)	
DEFENDANT)	

And the Plaintiff claims of the Defendant the sum of One Hundred and 12/100 \$100.12) Dollars, due from them by account August 16, 1963, which sum of money with interest thereof, is still unpaid.

BROOKS, GARRETT & THOMPSON

BY: *Joe B. Thompson*
Attorneys for the Plaintiff

FILED

JAN 29 1964

EX-1-24-64

ALICE I. DUCK, CLERK REGISTER

710. 5898

Watson Hardware Co

Mrs. Sadie B. Thompson

of whom the undersigned is the attorney at law and
15100 (1900.75) dollars, due from said company to said
and her estate and to the estate of her late husband

received on 21 day of Jan 1944
served a copy of the within on 21 day of Jan 1944
at Astoria
Sadie B. Thompson

TAYLOR WILKINS
W. A. Tolbert
Parish

Sherriff claims
Cash
Clean Cents personal totals
TAYLOR WILKINS, Sheriff
BY W. A. Tolbert
Deputy Sheriff
County Clerk
TAYLOR WILKINS, Sheriff
County Clerk

FILED

[Handwritten signature]

SHERRIFF'S OFFICE

FILE NUMBER

1338

FILED

JAN 22 1944

ALICE J. DUNN, CLERK, REGISTER

Filed

WATSON HARDWARE COMPANY, INCORPORATED, 0
A CORPORATION, 0

PLAINTIFF 0

VS 0

MRS. SADIE B. THOMPSON, 0

DEFENDANT 0

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 5898

Comes now the Defendant and for answer to the Complaint and
and to each count thereof, separately and severally, interposes the
following separate and several pleas thereto:

ONE

She is not guilty of the matters alleged therein .

TWO

The material allegations thereof are untrue.

THREE

The debt, for the recovery of which this suit was brought,
was paid in full before the action was commenced.

THOMPSON & WHITE

BY Mary Thompson White

The Defendant demands a trial by jury.

THOMPSON & WHITE

BY Mary Thompson White

FILED

FEB 25 1964

ALICE I. DUCK, CLERK
REGISTER

BROOKS, GARRETT & THOMPSON
ATTORNEYS AT LAW
P. O. Box 712
BREWTON, ALABAMA

LEON G. BROOKS
BROOK G. GARRETT
JOE B. THOMPSON, JR.

TELEPHONE
AREA CODE 205
867-6063

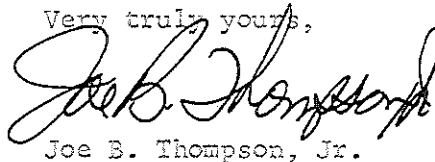
January 20, 1964

Clerk of the Circuit Court
Baldwin County
Bay Minette, Alabama

Dear Sir:

Enclosed herewith is a Summons and Complaint along with a copy thereof. Please file this Summons and Complaint in the Circuit Court of Baldwin County and have the sheriff make service on Mrs. Sadie B. Thompson of Perdido, Alabama.

Very truly yours,



Joe B. Thompson, Jr.

JBTjr/mm

Enclosures (2)