

4858

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon THOMAS LEE MILLS 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, Alabama, at the place of holding same by FOLEY MOTOR COMPANY, a partnership.

Witness my hand this the 8th day of September, 1961.

N.F. * * * * * *Alise J. Duck*
Clerk

COMPLAINT

FOLEY MOTOR COMPANY, a)	
partnership,)	
PLAINTIFF)	IN THE CIRCUIT COURT OF
)	
VS:)	BALDWIN COUNTY, ALABAMA
)	
THOMAS LEE MILLS,)	AT LAW
DEFENDANT)	

COUNT I:

The plaintiff claims of the defendant TWO HUNDRED TWENTY-FOUR & 16/100 DOLLARS (\$224.16), due from him by account on, to wit: the 31st day of August, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant TWO HUNDRED TWENTY-FOUR & 16/100 DOLLARS (\$224.16), due from him on account stated between the plaintiff and the defendant on, to wit: the 31st day of August, 1961, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant TWO HUNDRED TWENTY-FOUR & 16/100 DOLLARS (\$224.16), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 31st day of August, 1961, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 11th day of August, 1961.

Julius C. Clark
Attorney for Plaintiff

The defendant's address is:

Foley, Alabama

FILED
SEP 18 1961
ALISE J. DUCK, CLERK REGISTER

No. 14858

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FOLEY MOTOR COMPANY, a
partnership,

PLAINTIFF

-VS-

THOMAS LEE MILLS,

DEFENDANT

retaining att.

FILED
SEP 8 1961
ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

Not found in my county after diligent search and in-
quiry.
By Jay C. Mills 21 day of Aug 1961
Deputy Sheriff

Received
I served a copy of the writ within
on Thomas Lee Mills
day of Sept 1961
by service on Taylor Wilkins, Sheriff
D.S.
By _____