

SUMMONS

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

4974

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon R. E. WHITNEY 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 L. IRWIN & SON, a partnership composed of L. IRWIN and F. L. IRWIN.

Witness my hand this the 29 day of December, 1961.

Exp 2-2-62

Allice L. Duck  
Clerk

CC

COMPLAINT

L. IRWIN & SON  
PLAINTIFF

VS:

R. E. WHITNEY  
DEFENDANT

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)

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COUNT I:

The plaintiff claims of the defendant SEVEN HUNDRED THIRTY TWO & 49/100 DOLLARS (\$732.49), due from him by account on, to wit: the 15th day of December, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant SEVEN HUNDRED THIRTY TWO & 49/100 DOLLARS (\$732.49), due from him on account stated between the plaintiff and the defendant on, to wit: the 15th day of December, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant SEVEN HUNDRED THIRTY TWO & 49/100 DOLLARS (\$732.49), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 15th day of December, 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 15th day of December, 1961.

The defendant's address is:  
Lillian, Alabama

Allice L. Duck  
Attorney for Plaintiff

FILED

36

DEC 29 1961

ALICE L. DUCK CLERK

4974

SUMMONS

L. IRWIN & SON, a partnership  
composed of L. IRWIN and F.  
L. IRWIN.

PLAINTIFF

L. E. WHITNEY

DEFENDANT

Received 29 day of Dec 1961  
and on 29 day of Feb 1962  
I served copy of the within on L. E. Whitney  
on 29 day of Dec 1961  
By service on Taylor Wilkins

TAYLOR WILKINS  
By Forest A. Christian

L. E. Whitney

Sheriff claims 100 miles at  
Ten Cents per mile Total \$ 10.00  
TAYLOR WILKINS, Sheriff  
BY Forest A. Christian  
DEPUTY SHERIFF

FILED

DEC 29 1961

ALICE J. DUCK, CLERK  
REGISTER

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA