

STATE OF ALABAMA |

COUNTY OF MOBILE |

GEORGE B. WRIGHT,

PLAINTIFF,

VS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4977

EARLY GASKIN and
PINKIE GASKIN' whose names
are otherwise unknown, jointly
and severally as to each,

DEFENDANTS.

COUNT ONE

Plaintiff claims of the Defendant \$303.63 due from him by account, on, to-wit the 12th day of August, 1961, which sum of money with the interest thereon is still due and unpaid.

COUNT TWO

Plaintiff claims of Defendant \$303.63 due from him on account stated between Plaintiff and Defendant on, to-wit, the 12th day of August, 1961, which sum of money with interest thereon is still due and unpaid.

COUNT THREE

Plaintiff claims of the Defendant \$303.63 due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit, December 1, 1957, which sum of money with interest thereon is still due and unpaid.

William H. Cowan
ATTORNEY FOR PLAINTIFF

Plaintiff attaches hereto an itemized, verified statement of account and makes same a part hereof.

William H. Cowan
ATTORNEY FOR PLAINTIFF

Defendants' address is:
Montrose, Alabama.

FILED

DEC 20 1961

ALICE L. DICK, CLERK
REGISTER

210

IN ACCOUNT WITH GEORGE B. WRIGHT, FAIRHOPE, ALABAMA.

1957

Early Gaskin & Pinkie Gaskin,
Montrose, Alabama

DEBITS:

Sewing Machine -----	\$ 20.00
Window Screen -----	19.50
Front Door & Two small windows -----	16.00
Screen Door -----	3.50
Bath Tub -----	30.00
Window Fan -----	30.00
Rug -----	2.00
Screen Door -----	2.00
Loan -----	35.00
Youngs Town Kitchen Cabinet & Double Sink -----	300.00

CREDITS:

Cash & Labor paid	458.00
	73.12
	384.88
Labor- Earl Jr. 2/28/58	1.00
	383.88
Sewing Machine taken back credit	15.00
	368.88
Hauling Trash by Earl Jr.	12.00
	356.88
Labor Earl Jr 1/28/59	7.00
	349.88
Borrowed for Gas	.50
	350.38
Labor Earl Jr. 1/29/59	1.00
	349.38
Hauling Trash 3/30/59	6.00
	343.38
Borrowed for Gas 3/30/59	.50
	343.88
Labor Earl Jr. March	1.50
	342.38
Labor Earl Jr. 3/16/59	2.75
	339.63
Labor Earl Jr. 3/18/59	3.00
	336.63
Labor Earl Jr. 4/6/59	2.00
	334.63
Labor Earl Jr. 4/7/59	2.00
	332.63
By cash Early & Pinkie Gaskin 6/13/60	10.00
	322.63
By cash E. & P. Gaston 8/12/61	5.00
	317.63
By Cash Oct. & Nov.	14.00
	303.63

STATE OF ALABAMA }

COUNTY OF MOBILE }

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared George B. Wright, who being by me first duly sworn deposes and says that the annexed statement of account against Early Gaskin and Pinkie Gaskin, whose names are otherwise unknown, of Montrose, Baldwin County, Alabama, is just, true and correct; and that there are no credits, set-offs or counterclaims, except as set out and that the amount now due is \$303.63.

Dated this 15th day of December, 1961.

George B. Wright
George B. Wright

Subscribed and sworn to before
me this 15th day of December, 1961.

Agnes M. McDonnell
Notary Public, State of Alabama at
Mobile County

William H. Cowan, as Attorney.

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4977

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Early Gaskin and Pinkie Gaskin

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, State of Alabama, at Bay Minette, against Early Gaskin and Pinkie Gaskin,
whose names are otherwise unknown, jointly and severally as to each, Defendant.

by George B. Wright

Plaintiff

Witness my hand this 20 day of December 19 62

Clerk

No. 4977

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THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

GEORGE B. WRIGHT

Plaintiffs

vs.

EARLY GASKIN AND PINKIE GASKIN

Defendants

SUMMONS and COMPLAINT

Filed 8th Dec. 20, 1961

Alice J. Duck, Clerk

William H. Cowan
Graystone Bldg. Plaintiff's Attorney
Mobile, Alabama

Defendant's Attorney

Defendant lives at _____

RECEIVED IN OFFICE

10/23, 1962

, Sheriff

I have executed this summons

this 25th day of Oct, 1962

by leaving a copy with

Earlie Gaskin &
Pinkie Gaskin.

Sheriff claims 4 miles at

Ten Cents per mile Total \$ 4.00

TA OR WILKINS, Sheriff

BY Seibert
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Fred Seibert Deputy Sheriff
Montane

55
10

WILLIAM H. COWAN

ATTORNEY AT LAW
GRAYSTONE BUILDING
MOBILE, ALABAMA

December 19, 1961.

Clerk of Circuit Court of
Baldwin County,
Bay Minette, Alabama.

Dear Sir:

Enclosed herewith is Complaint in the case of George B. Wright vs. Early Gaston and Pinkie Gaston, which I would thank you to file and have summons issued to the defendants in the case.

Thanking you, I am

Yours very truly,


WILLIAM H. COWAN

WHC:am
encl: