

SUMMONS

4988

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

You are hereby commanded to summon MILFRED HARRISON 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 JOE LONG, doing business as JOE LONG GROCERY.

Witness my hand this the 3rd day of January, 1962.

Alfred Duck
Clerk

E.L. - 2-16-62

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COMPLAINT

JOE LONG)
D/B/A JOE LONG GROCERY)
) IN THE CIRCUIT COURT OF
) PLAINTIFF)
) BALDWIN COUNTY, ALABAMA
VS:)
) AT LAW
MILFRED HARRISON)
)
) DEFENDANT)

COUNT I:

The plaintiff claims of the defendant ONE THOUSAND THREE and 94/100 DOLLARS, (\$1,003.94), due from him by account on to wit: the 26th day of October, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT II:"

The plaintiff claims of the defendant ONE THOUSAND THREE and 94/100 DOLLARS, (\$1,003.94), due from him on account stated between the plaintiff and the defendant on, to wit: the 26th day of October, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE THOUSAND THREE and 94/100 DOLLARS (\$1,003.94), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 26th day of October, 1960, 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 3rd day of January, 1962.

The defendant's address is:
Summerdale, Alabama

FILED

Julius Plummer
Attorney for Plaintiff

JAN 5 1962

ALICE J. DUCK, CLERK REGISTER

AFFIDAVIT

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

I, JOE LONG, first being duly sworn, deposes and says as follows:
My name is JOE LONG and I own JOE LONG GROCERY in Summerdale, Alabama
and sold MILFRED HARRISON groceries from December 8, 1959 to October
26, 1960, as shown on the attached statement and after allowing on
just credits the balance is \$1,003.94.

Joe Long
Joe Long

Sworn to and subscribed before
me, this the 3rd day of January,
1962.

Forest A. Christian
Notary Public, Baldwin County,
Alabama

Forest A. Christian
Notary Public
Baldwin County, Ala.
My Commission Expires Dec. 11, 1965

SUMMONS

JOE LONG, D/B/A JOE LONG
GROCERY

PLAINTIFF

MILFRED HARRISON

DEFENDANT

Sheriff claims 5.2 miles at

Ten Cents per mile Total \$ 5.20
TAYLOR WILKINS, Sheriff

BY [Signature]
DEPUTY SHERIFF

Received 2 day of Jan 1962
and on 15 day of Feb 1962
I served a copy of the within 1962
on Milfred Harrison
By service on _____

FILED
JAN 5 1962
ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

TAYLOR WILKINS
BY [Signature]
ROBERTSON