

JAMES A. BRICE
ATTORNEY AT LAW
BOX 299 • FOLEY, ALABAMA • WH3-3601

MESSAGE

REPLY

TO Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

DATE November 20, 1963

re: Sears Roebuck & Company
vs: Irving F. Welch

Enclosure: Summons and Complaint

DATE

5835

Mr. 5835

BY

SIGNED

Alice J. Duck

RECIPIENT KEEP THIS COPY, RETURN WHITE COPY TO SENDER

JAMES A. BRICE

ATTORNEY AT LAW
FOLEY, ALABAMA

P.O. Box 298

WHITEHALL 3-3601

April 10, 1964

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re: Sears Roebuck & Company
Vs: Irving F. Welch
At Law, No. 5835

Dear Mrs. Duck:

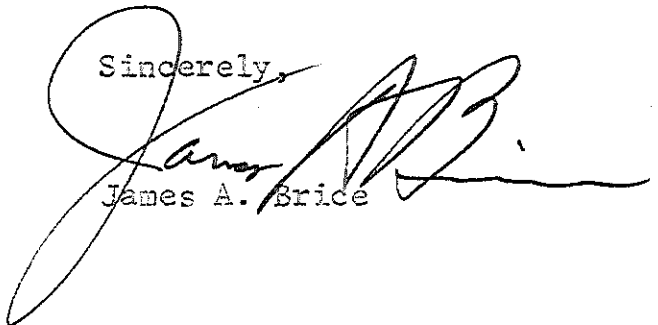
According to my records, plaintiff is entitled to judgment by default in the above captioned case.

Please place the file before Judge Hall for judgment as follows:

Due on account	\$382.51
Interest 4/9/63--4/9/64	<u>30.60</u>
	\$413.11

Thank you for your usual prompt attention to this request.

Sincerely,


James A. Brice

JAB:j

SEARS, ROEBUCK & COMPANY

PLAINTIFF

VS

IRVING F. WELCH

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

710 5835

COMPLAINT

I

The Plaintiff claims of the Defendant Three Hundred Eighty-two and 51/100 Dollars (\$382.51), due from him on account, to-wit: the 9th day of April 1963, which sum of money, with interest thereon, is still unpaid.

II

The Plaintiff claims of the Defendant Three Hundred Eighty-two and 51/100 Dollars (\$382.51), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: the 9th day of April 1963, which sum of money, with interest thereon, is still unpaid.


Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof, an itemized statement of account verified by affidavit of William H. Bell, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 9th day of April 1963.

FILED
NOV 21 1963
ALICE L. DUCK, CLERK
REGISTER

Spring Field
Orange Beach, Ala.

3437

300.00*	4.49	.00	.00
270.85*	4.65	60.00	23.20
296.51*	4.17	30.00	51.49
580.00*	1.56	55.66	24.55
252.09*	5.56	111.34	
307.11*	5.02	78.09	52.09
254.51*	4.61	57.11	.00
298.94*	3.93	.00	40.40
378.52*	4.59	.00	75.29
364.51*	5.69	.00	.00
431.93*	5.86	.00	41.54
433.76*	6.48	31.93	27.22
428.76*	6.61	27.87	16.26
232.07*	5.57	43.00	
486.97*	5.46	.00	124.44
494.28*	7.31	.00	.00
465.69*	7.41	36.00	.00
472.58*	6.99	.00	.00
479.78*	7.10	.00	.00
439.00*	7.20	47.98	.00
445.59*	6.59	.00	.00
452.28*	6.52	.00	.00
459.06*	6.78	.00	.00

1

60.00* 30.00

30.00*

30.00*

4.49*

15.40*

27.27*

43.00*

40.40*

28.00*

85.00*

135.00* 25.00

146.00* 99.00

194.00* 145.00

242.00* 194.00

238.02* 194.02

283.02* 238.02

329.02* 283.02

375.02* 329.02

751

Irving Welch
Orange Beach, Ala.

39.17 *	6.39	6.78	23.56
442.84 *	6.89	46.78	23.56
392.71 *	6.65	56.78	.00
398.61 *	5.90	.00	.00
404.60 *	5.99	.00	.00
410.68 *	6.08	.00	.00
376.85 *	6.17	40.00	.00
362.51 *	5.66	.00	.00
368.26 *	5.75	.00	.00

*returned
check*

414.14 *	368.24
436.02 *	391.02
392.71 *	379.24
398.61 *	392.71
404.60 *	398.61
410.68 *	404.60
376.85 *	370.68
362.51 *	376.85
368.26 *	362.51

I certify that this is a true copy of the account of
Irving F. Welch with Sears, Roebuck and Co., Pensacola, Florida.

William H. Bell

William H. Bell
Collection Manager

Sworn to and subscribed before me this 16th day
of November, 1963.

Ernie Smith

Notary Public
My Commission Expires Feb. 19, 1967

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Irving F. Welch

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 _____

Irving F. Welch

_____, Defendant_____

by _____

Sears, Roebuck & Company

_____, Plaintiff_____

Witness my hand this 21 day of Nov 19 63

Ed-1-28-64

Reid L. Lusk, Clerk

No. 5835

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Sears Roebuck & Company

Plaintiffs

vs.

Irving F. Welch

Orange Beach Defendants

Summons and Complaint

FILED

Filed

19

NOV 21 1963

Clerk

ALICE I. DUCK, CLERK
REGISTER

*Subject used to work
for WEAR.*

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Orange Beach, Alabama

Received In Office

Nov. 21, 1963

Taylor Wilkins

Sheriff.

I have executed this summons

this 28th Jan 1964

by leaving a copy with

Irving F. Welch

Sheriff's Claims 120

Ten Cents per mile Total \$ 12.00

TAYLOR WILKINS, Sheriff
by JM Eastman
DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

JM Eastman
Deputy Sh
Orange Beach