JAMES A. BRICE ATTERNEY AT LAW BOX 298 • FOLEY, ALABAMA • WHIS-3601

	MESSACE	REFLY
מד	Mrs. Alice J. Duck Circuit Clerk Bey Minette, Alabama	DATE
DATE	Movember 20, 1963	(5835)
an and desired any angle of the second secon	re: Sears Roebuck & Company vs: Trving F. Welch	
	Enclosure: Summons and Complaint	
6 Y		SIGNED Clint NUCK

JAMES A. BRICE

ATTORNEY AT LAW Foley, Alabama

P.O. Box 298

WHITCHALL 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
Interest 4/9/63--4/9/64

\$382.51 _30.60

\$413.11

Thank you for your usual prompt attention to this

request.

Sinderely

James A. Bricé

JAB:

PLAINTIFF

PLAINTIFF

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IRVING F. WELCH

AT LAW

710, 5 % 35

COMPLAINT

DEFENDANT

I

The Plaintiff claims of the Defendant Three Hundred Eightytwo 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 Eightytwo and 51/100 Dollars (\$382.51), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, towit: 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.



127 198 3 1 22 22 20 30 30 40 07	plob Lakko			e e e	on the control of the	
			•		C 4.3.7	notaria e come comence de la come e e e e e e e e e e e e e e e e e e
		300, 200		E TO SEE A	and the agreement	, a dia manamakan garan manana kata ka manana a kata ka manana a ka manana a ka manana a ka manana a ka manana
	00	4 46 190			30.00	Announce and a second a second and a second
70854 4.65 296514 4.17	30.00		emining Manageria	70.00 %		entre romanio and remandration or statement of a second of the contract of the second
	55.66			7000 0		e de la companya de la servició de la companya del companya de la companya de la companya del companya de la co
	177.34			. 4 6 7 7 A A A A A A A A A A A A A A A A A		e de la companya de l
		5209	dia to the second secon			an exceptional control of the contro
· · · · · · · · · · · · · · · · · · ·	78.09			en erstere in de		hanner, eng apalant i thaquag adharan parties en e territoria e en e de tre e
254519 4.61	57.11	.00		i		has against the constraint of
298848 3.95	.00	A D.AC	and the second s			and an external confidence of the confidence of
378.62 4 459	.00	75.29	the state of the s			
384514 569	.00			**		prompto sectional assessment of the extension of the exte
	.00	de de la companya del companya de la companya de la companya del companya de la c			La Carrier Control	and the state of t
43375 £	31.93	and some some some some	and the second of the second o	The state of the s		en en sommen en e
428.76 # 5.61	27.81		ing the second s	4.1.CO#	en e	e Inneres American (2014), in a consistence of the Interest (2014).
er salger fall de groei de falle fall de falle fall Falle falle fa	43.00			and the second of the second o		Commence of the Commence of th
15707# 587	40.00					Anne fing and constitutions of the graphs part of the first of
486.97 # 5,46	,00	22424		\$5.00 m		and the second section of the second
49428 9 731	.00	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				Dorbowy to the control of the contro
465.69 7.41	36.00			14600	9900	Appropriate constitutions of Special Contract and Contract Contrac
472.58 x 699	.00		Section 1	1 S.A. T. N.	- 1 24500	The state of the s
479.78# 7.10	.00	.00	the service bearing	242.00 #	194.00	Annual parties and programmer and a survival state of the second s
43900 * 7.20	47.98	the state of the s			1.94.02	See my market as a straight a son and a son a
44559* 659.	00	.00	and the same of th	20202	the said the said was	
2 000 pm	.00		751		19 9 18 K 18 K	Commence of the commence of th
459.06* 678	•00	.00	The state of	275.02		
And the state of t	engan sakarasa dahi engan dahi sakar	Mark the state of the day that pales the same is the second	de a MAN AN ANT CONTRACTOR DE	in demonstrated the second	Bakasa Kasabali,	

Gr. Irving Telah

			The second se	T 8 (B. 24)	
- 50.7 × 6.39 6.78			A CONTRACTOR OF THE SECOND	29102	aan aan ah
46.79	235 returned Check		45602 * 1		مينية أكوار المحمد المينيين بين بين بين بين المحمد المينيين المحمد المحمد المينيين المحمد المحمد المحمد المحمد المحمد المحمد المحم
46.79 46.79 56.78	in the Chart		20222		and a sum of the control of the papers.
Dan Charles and the control of the c	.20		· 等交融区值 數。		The state of the s
	San Care		4.04.00	398.61	and the second s
00. 69.5 * 00.40			410.68*	404.60	park in the first annually of a constant formula and constant of the first of
410.68 % 508		The second secon	278654	27063	
376.85 * 6.17 40.00			388.22*	The same of the sa	and the second s
382.51 4 5.66			388,264	362.51	
388.26 * 5.75		Beach Carlot		A CONTRACTOR OF THE CONTRACTOR	an agreement grant of a single surface or an arrange of the same of
		mer of the acc	nint of		ge gan general general service services en entre la la la la grande en entre la la la la grande en en entre la La grande en en entre la grande en entre la grande en entre la grande en entre la grande en entre la grande en entre la grande en entre la grande en en entre la grande en en entre la grande en en entre la grande en en entre la grande en entre la grande en entre la grande en en entre la grande en en entre la grande en entre la grande en entre la grande entre la grande en entre la

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 Collection Manager

Sworn to and subscribed before me this l6th day of November, 1963.

The State of Alabama,	Circuit Court, Baldwin County
Baldwin County.	No.
	TERM, 19
TO ANY SHERIFF OF THE	S STATE OF ALABAMA
You Are Commanded to Summon	Irving F. Welch
O appear and ploed	
o appear and plead, answer or den	nur, within thirty days from the service hereof, to the complaint filed in
o appear and plead, answer or den	nur, within thirty days from the service hereof, to the complaint filed in
o appear and plead, answer or den he Circuit Court of Baldwin Coun	nur, within thirty days from the service hereof, to the complaint filed in ty, State of Alabama, at Bay Minette, against
o appear and plead, answer or den	ty, State of Alabama, at Bay Minette, against Irving F. Welch Defendant
o appear and plead, answer or den	ty, State of Alabama, at Bay Minette, against Trving F. Welch Defendant
to appear and plead, answer or den	nur, within thirty days from the service hereof, to the complaint filed in ty, State of Alabama, at Bay Minette, against

		-/	42	کم ہ
Νo.	J.	7	. 1	5
LVO.				

Defendant lives at

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Sears Roebuck & Company

Plaintiffs

Irving F. Welch

Defendants

Summons and Complaint

Filed -

NOV 21 19831

Subject word to work

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Orange Beach, Alabama

Received In Office

Sheriff.

I have executed this summons

by leaving a copy with

Sheriff.