

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon CHARLEY ENGSTROM, 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 24 day of February, 1963.

Deice J. Ruck
Clerk

COMPLAINT

5490

JOE LONG, doing business)
as JOE LONG GROCERY,)

PLAINTIFF)

VS:)

CHARLEY ENGSTROM,)

DEFENDANT)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant THREE HUNDRED FORTY-SEVEN AND 74/100 (\$347.74) DOLLARS, due from him by account on, to wit: the 2nd day of December, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant THREE HUNDRED FORTY-SEVEN AND 74/100 (\$347.74) DOLLARS, due from him on account stated between the plaintiff and the defendant on, to wit: the 2nd day of December, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant THREE HUNDRED FORTY-SEVEN AND 74/100 (\$347.74) DOLLARS, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 2nd day of December, 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 25th day of February, 1963.

July C. Plum
Attorney for Plaintiff

The Defendant's Address is:
Summerdale, Alabama

64-272-64

FILED
FEB 28 1963
ALICE J. DICK, CLERK
REGISTER

AFFIDAVIT

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

MRS. JOE LONG, being first duly sworn, deposes and says as follows:

My husband and I are the owners of JOE LONG GROCERY, Marlowe, Alabama, and CHARLEY ENGSTROM owes for groceries the sum of THREE HUNDRED FORTY SEVEN AND 74/100 (\$347.74) DOLLARS, from December 2, 1960, after allowing all just credits.

Mrs Joe Long (SEAL)
Mrs. Joe Long

Subscribed to and sworn before me
this the 25th day of February, 1963.

Maup Churish
Notary Public
Baldwin County, Alabama

Received 28 day of Feb. 1963
and on day of 19
served a copy of the within D & C
Charley Engstrom
By service on
TAYLOR WILKINS, Sheriff
By D. S.

RETURNED 7-17-63
Not found in my County after dili-
gent search and inquiry.
RAY D. BRIDGES, Sheriff
By W. H. Fischer, Jr.

EXECUTED
This 28 day of Feb. 1964
by serving a copy of the within on
Charley Engstrom
RAY D. BRIDGES, Sheriff
By B. J. Harris D. S.

MA 5490
7/17/63
W
3772
2102

SUMMONS AND COMPLAINT

JOE LONG, doing business as JOE
LONG GROCERY,

PLAINTIFF

VS: W. H. Fischer, Jr.
CHARLEY ENGSTROM,

DEFENDANT

RECEIVED

FEB 10 1964

SHERIFF'S OFFICE

FILED

FEB 26 1965

ALICE J. DUCK, CLERK
REGISTER

JUL 11 1963

SHERIFF'S OFFICE
FOREST A. CHRISTIAN
FOLEY, ALABAMA

JOE LONG, doing business
as JOE LONG GROCERY,

Plaintiff,

Vs.

CHARLEY ENGSTROM,

Defendant.

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

5490

Comes now the Defendant in the above styled cause and for
answer to the Plaintiff's Complaint, and each count thereof,
separately and severally says:

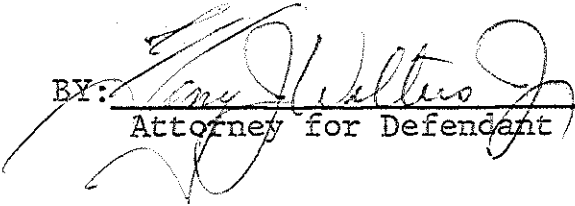
1.

That he is not guilty of the matters alleged therein.

2.

That the said account sued on is barred by the Statute of
Limitations for three (3) years.

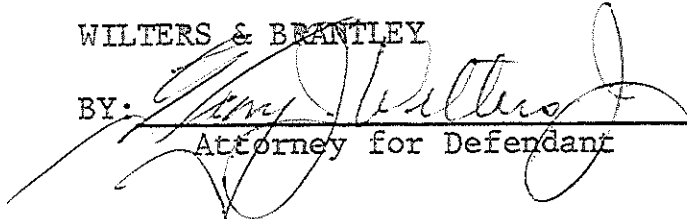
WILTERS & BRANTLEY

BY: 

Attorney for Defendant

The Defendant demands a trial by jury.

WILTERS & BRANTLEY

BY: 

Attorney for Defendant

FILED

APR 30 1964

ALICE J. DICK, CLERK
REGISTER

FOREST A. CHRISTIAN
ATTORNEY AT LAW
P.O. DRAWER 190
AREA CODE 205 - PHONE WH 3-2201
FOLEY, ALABAMA 36535

June 22, 1964

Honorable H. M. Hall
Judge of Circuit Court
Bay Minette, Alabama

Re: Joe Long, d/b/a Joe Long
Grocery, Plaintiff,
Vs: Charley Engstrom, Defendant
Jury 5490

Dear Judge Hall:

Wilters & Brantley have filed an answer in this case, and one of the grounds is that it is barred by the statute of limitations after three years.

Upon further investigation this appears to be true. I will ask you to take a non-suit in this case and am sending a copy of this to the attorneys for their information.

Cordially yours,


FOREST A. CHRISTIAN

FOREST A. CHRISTIAN
ATTORNEY AT LAW
P.O. DRAWER 190
AREA CODE 205 - PHONE WH 3-2201
FOLEY, ALABAMA 36535

March 27, 1964

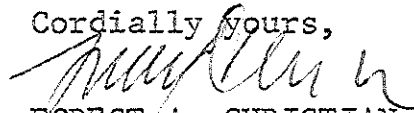
Honorable H. M. Hall
Judge of Circuit Court
Bay Minette, Alabama

Re: Joe Long, d/b/a Long's Grocery
Vs: Charley Engstrom
\$437.00

Dear Judge Hall:

Kindly render judgment in this case on and for the
amount of \$437.00 on a sworn to itemized statements.

Cordially yours,



FOREST A. CHRISTIAN



EARL M. MCGOWIN
DIRECTOR

C. G. HIXON
CHIEF

STATE OF ALABAMA
DEPARTMENT OF CONSERVATION
DIVISION OF GAME AND FISH
MONTGOMERY 4, ALABAMA

Foley, Ala.
January 24th 19 53

Mr C.R.Trousdale
R.F.D.2
Deatsville, Ala.

Dear Mr Trousdale:

20702

The case of John Mitchells' has been reset for
Saturday morning January 31st 1953 at Bay Minette before
Judge T.C.Hand.

Very truly yours

W.C. Wharton
Supervisor
Foley, Ala.

~~Call Dinner 7341~~

Pay Part on Britton Boat

~~Call about 7341~~

See HOLT Radio 48 p's

~~Call Bank about 7341~~

See Cook Eagle Lion

Get Den down at Jackson

GROCERY

JOE LONG GROCERY
 FOLEY WH. 3-6741
 SUMMERDALE, ALABAMA

Date 12-1 1960
 M. Chas. Engstrom

CLERK	ACCOUNT FORWARDED
groc	47
1/4 - groc	1 35
1/2 - groc	4 41
	<u>1 53.98</u>
T 4	3 96
	<u>1 87.94</u>

30

ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY

JOE LONG GROCERY
 FOLEY WH. 3-6741
 SUMMERDALE, ALABAMA

Date 12/5 1960
 M. Chas. Engstrom

REG. NO.	CLERK	ACCOUNT FORWARDED
1	nov. acct	1 57 94
2	ord acct	1 47 96
3		
4		<u>3 35 90</u>
5		
6		
7		
8		
9		
10		
11		
12		
13	<u>1</u>	

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY

JOE LONG GROCERY
 FOLEY WH. 3-6741
 SUMMERDALE, ALABAMA

Date 12/2 1960
 M. Chas Engstrom

REG. NO.	CLERK	ACCOUNT FORWARDED
1	groc	1 07
2	hen sud	55
3	1/3 - groc	4 86
4	1/5 - groc	2 24
5	1/5 - groc	1 59
6	Mrs Engstrom	
7	1 1/2 cabbag. & yest	88
8	1/5 - Condy	30
9	ff	35
10		<u>74</u>
11		
12	Statement	347
13	41	

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY
& MARKET

JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 11-25 1960

Chas. Engstrom

NO.	CLERK	ACCOUNT FORWARDED	
		145	19
	groc.		123
		145	42
1/25	- groc.		159
	scratch feed		55
2/5	- groc.		202
2/6	- groc.		317
2/6	- groc.		638
11/28	- groc.		240
11/28	- Cong bread		39
11/28	- groc.		493
11/28	- groc.		246
11/28	- groc.		744
48			177 25

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY
& MARKET

JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 11/10 1960

Chas. Engstrom

REG. NO.	CLERK	ACCOUNT FORWARDED	
1	groc	9503	485
2		99	90
3			
4	Mr Engstrom		
5			
6	11/1 - groc.		170
7	scratch feed		55
8	11/4 - Carrots		30
9	11/2 - groc.		615
10	11/2 - groc.		20
11	11/4 - groc.		166
12	11/5 - groc.		216
13	49		112 62

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY
& MARKET

JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 11-15 1960

Chas. Engstrom

REG. NO.	CLERK	ACCOUNT FORWARDED	
1	groc.	112	62
2	11/7 - groc.		573
3	11/15 - groc.		328
4	11/15 - groc.		443
5	11/19 - groc.		396
6	11/19 - groc.		216
7	11/21 - groc.		216
8	11/21 - milk		16
9	11/22 - groc.		23
10	11/22 - Candy		4
11	11/22 - ice cream		4
12	11/22 - groc.		57
13	46		4

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

RY

KEY

JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 10-31 1960M. Chas. Engstrom

CLERK

ACCOUNT
FORWARDED

176 57

gro

1 96

178 53

tax to date

336

181 89

30

ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY



JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 11-7 1960

M.

Chas. Engstrom

REG. NO.

CLERK

ACCOUNT
FORWARDED

1

sect. tax pd

181 89

2

paid

130 00

3

4

Bah H. H.

51 89

5

6

7

8

9

10

11

12

13

33

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY



JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 11-1 1960

M.

Chas. Engstrom

REG. NO.

CLERK

ACCOUNT
FORWARDED

51 89

1

gro

5 24

2

11/2 gro

5 13

3

11/2 gro

2 97

4

11/3 gro

4 81

5

11/4 gro

3 08

6

11/5 gro

3 84

7

11/5 gro

4 35

8

11/7 gro

3 38

9

10

11

12

13

33

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.



JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 10-21 1960

M. Chas. Engstrom

REG. NO.	CLERK	ACCOUNT FORWARDED
		149 98
1		1 39
2		4 47
3		1 09
4		2 88
5		2 13
6		1 37
7		5 07
8		3 10
9		
10		171 48
11		5 09
12		176 57
13		42

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY



JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 10-12 1960

M. Chas. Engstrom

REG. NO.	CLERK	ACCOUNT FORWARDED
		116 11
1		2 91
2		2 98
3		3 23
4		4 0
5		5 63
6		5 05
7		5 02
8		2 88
9		65
10		55
11		2 39
12		2 18
13		37

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY



JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 10/1 1960

M. Chas. Engstrom

Aut. to pt.

REG. NO.	CLERK	ACCOUNT FORWARDED
		66 61
1		5 46
2		4 29
3		4 84
4		6 70
5		1 60
6		1 13
7		3 07
8		5 49
9		3 7
10		4 65
11		7 33
12		4 57
13		22

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 9-20 1960

M. Engstrom

CLERK	ACCOUNT FORWARDED	
	1	66 09
1. gro		1 48
1. gro		38
1. gro		1 37
2 - gro		1 02
2 - gro		94
23 - gro		1 83
23 gro		45
23 gro		1 27
24 gro		7 48
4 - gro		5 13
26 - milk		28
26 - gro		2 31
6		<u>184 03</u>

ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY



JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 9-27 1960

M. Chas. Engstrom

REG. NO.	CLERK	ACCOUNT FORWARDED
1	gro	1 47
2	9/28 gro	93
3	9/28 gro	1 71
4	9/29 gro	3 30
5		<u>191 44</u>
6		
7	9/30 gro	1 54
8		98
9		<u>192 98</u>
10	Ty today	3 63
11	RECT	<u>796 61</u>
12		
13	11	

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY



JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 10-8 1960

M. Chas. Engstrom

REG. NO.	CLERK	ACCOUNT FORWARDED
1	Act today	1 96 61
2	paid	1 30 00
3		<u>66 61</u>
4		
5		
6		
7		
8		
9		
10		
11		
12		
13	16	

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY
& MARKET

JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 9/13 1960

Chas Engstrom

NO.	CLERK	ACCOUNT FORWARDED	
		132	79
	groc	2	33
9/14	groc	4	68
9/14	groc	2	45
9/14	scratch food		55
9/16	groc	3	89
9/16	groc	2	88
9/17	groc	2	56
9/17	Chath.	3	29
9/17	groc	4	57
9/19	groc	3	56
9/19	groc	1	43
9/20	groc	1	11
	32	1	66 09

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY
& MARKET

JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 9/8 1960

Chas Engstrom

REG. NO.	CLERK	ACCOUNT FORWARDED	
		39	15
1	groc	4	01
2		4	31 6
3	bread	1	3
4	9/10 - groc	4	82
5	9/10 - bread	1	5
6	9/10 Bal X P.P.	7	2 08
7	9/10 - groc	3	15
8	9/10 - groc	2	07
9	9/10 - drinks	2	0
10	9/12 - groc	4	83
11	9/12 - groc	4	3
12	9/13 - groc	1	75
13	8	1	32 79

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

GROCERY
& MARKET

JOE LONG GROCERY

FOLEY WH. 3-6741

SUMMERDALE, ALABAMA

Date 9-1 1960

Chas Engstrom

REG. NO.	CLERK	ACCOUNT FORWARDED	
1	groc		7 84
2	groc		2 60
3	groc		5 50
4	groc		5 14
5	groc		7 86
6	groc		2 25
7	9/6 groc		3 41
8	9/6 - groc		3 79
9	9/7 -		
10	9/7 -		
11			39 15
12			
13	22		

YOUR ACCOUNT STATED TO DATE. IF IN ERROR, RETURN AT ONCE.

Date 4/1 1958
 M. Chas. Engstrom

No. _____

Reg. No.	Clerk	ACCOUNT FORWARD
1	<u>Paid</u>	<u>260.83</u>
2		<u>60.00</u>
3		<u>200.83</u>
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		

7

Account Stated to Date — If Error Is Found Return at Once

Date 5/1 1958
 M. Chas. Engstrom

No. _____

Reg. No.	Clerk	ACCOUNT FORWARD
1	<u>Paid</u>	<u>200.00</u>
2		<u>10.00</u>
3		<u>190.00</u>
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		

47

Account Stated to Date — If Error Is Found Return at Once

Date 7/7 1958
 M. Chas. Engstrom

No. _____

Reg. No.	Clerk	ACCOUNT FORWARD
1	<u>Paid</u>	<u>20.00</u>
2		<u>170.00</u>
3	<u>18/7 - paid</u>	<u>20.00</u>
4	<u>paid</u>	<u>150.00</u>
5		
6	<u>6/27/59 Cr. by return</u>	
7	<u>short suit</u>	<u>2.04</u>
8		
9		<u>147.96</u>
10		
11		
12		
13		
14		
15		

13

Account Stated to Date — If Error Is Found Return at Once

Not Stated to Date — If Error Is Found Return at Once

Your Account Stated to Date — If Error Is Found Return at Once

Your Account Stated to Date — If Error Is Found Return at Once

Date 3/3 1958
 M. Engstrom

No. _____

Clerk	ACCOUNT FORWARD
M. Brown	21
envelopes	15
runes	26
	<u>183.16</u>

9

Your Account Stated to Date — If Error Is Found Return at Once

Date 3/4 1958
 M. Engstrom

No. _____

Reg. No.	Clerk	ACCOUNT FORWARD
1	Gro	1.32
2		
3		184.48
4	Mrs Engstrom	
5		
6	Groc	1.30
7	Groc	20
8	3/5 Groc	3.93
9		<u>189.91</u>
10		
11		
12	20	
13		
14		
15		

Your Account Stated to Date — If Error Is Found Return at Once

Date 3/6 1958
 M. Engstrom

No. _____

Reg. No.	Clerk	ACCOUNT FORWARD
1	Groc	5.73
2		
3		195.64
4	3/7-groc-	1.99
5		
6	Mrs Engstrom	
7		
8	3/7 groc	1.60
9	3/8 Groc	4.92
10	Candy + gum	.49
11	3/10 - Groc	1.33
12	7/11	.27
13	3/11 942	2.96
14		
15		<u>209.20</u>

Your Account Stated to Date — If Error Is Found Return at Once

Date 3-1 1958

M. Chas Engstrom

No. Ticket Jan to

Mrs Engstrom

Reg. No.	Clerk	ACCOUNT FORWARD
1	acct to lab	
2	TX pd.	221 12
3	Paid	50 00
4		171 12
5		
6	3/1 gro	2 56
7		173 68
8	Mrs Engstrom	
9		
10		
11		
12		
13		
14	31	
15		

Your Account Stated to Date — If Error Is Found Return at Once

Date 3-1 1958

M. Chas Engstrom

No. _____

Reg. No.	Clerk	ACCOUNT FORWARD
		173 68
1	gro	3 48
2		177 16
3	3/1 gro	65
4		
5		
6	Mrs Engstrom	
7	3/3 gro	4 38
8	3 sausage	35
9		
10		182 54
11		
12		
13	3	
14		
15		

Your Account Stated to Date — If Error Is Found Return at Once