

5901
ERNEST M. BAILEY

ATTORNEY AT LAW

221 FAIRHOPE AVE.

FAIRHOPE, ALABAMA

BOX 161

January 23rd, 1964

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

Dear Mrs. Duck:

I will appreciate you filing the attached
Bill of Complaint.

Very truly yours,

Ernest M. Bailey

Ernest M. Bailey
DMB/w

(39 w)

STATE OF ALABAMA)
COUNTY OF BALDWIN)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon BESSIE GRAYSON to appear and answer, plead or demur, within thirty days from the date hereof of this service, to a Bill of Complaint filed against her in Circuit Court, at Law, for said County and said State by Gordan's, Inc.

Herein fail not. Due return make of this writ as the law directs.

Witness my hand this the 24 day of January, 1964.

[Signature]
Clerk of Court

GORDAN'S IN., a Corporation,)

Plaintiff)

-vs-)

BESSIE GRAYSON,)

Defendant)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 5901

BILL OF COMPLAINT

COUNT I:

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED FORTY-NINE and 84/100 (\$449.84) Dollars damages for the breach of written agreement entered into by her on March 24, 1962, a copy of which agreement is attached to the original of this Bill of Complaint as Exhibit "A" and made a part hereof, as if fully set out herein, by which the Defendant purchased from the Plaintiff the following described property, to-wit: One Homko Lawn Mower, Model # 1222, Serial # G108300, One Homko Mower, Model # 1226, Serial # G49621, and One G.E. TV, Model 21C1439, Serial E 19464, and agreed to pay therefor said sum in monthly installments beginning April 11, 1962 and by the terms of said agreement a default in payment of any of the installments due thereunder the entire unpaid balance shall at once become due and payable. The defendant has continually failed or refused to pay the amount due by said agreement. The Plaintiff further claims of the Defendant the sum of One Hundred (\$100.00) Dollars as Attorney's fee for the collection of said debt and by the terms of said agreement the Defendant agreed to pay said amount.

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COUNT II

The Plaintiff claims of the Defendant FOUR HUNDRED FORTY-NINE and 84/100 (\$449.84) Dollars, due by him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on March 24, 1962, which sum of money, with the interest thereon, is still unpaid.

Edward M. Sabin
Attorney for the Plaintiff

FILED

JAN 24 1964

ALICE L. DICK, CLERK
REGISTER

64-1-27-64

NO. 5901

Gordon's In. a corp

VS

Bessie Grayson

Ingland?
807 So Union

FILED

JAN 24 1964

ALICE I. DICK, CLERK
REGISTER

Received 24 day of Jan 1964
and on 27 day of Jan 1964
I served a copy of the within B+C
on Bessie Grayson

By service on _____

TAYLOR WILKINS, Sheriff

BY Red Seibert
I hope

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
BY Taylor Wilkins, Sheriff
Red Seibert
DEPUTY SHERIFF