

H. F. BROWN, Individually, and H. F..
BROWN D/B/A BAY DINER,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

5993

BILL OF COMPLAINT


I

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY-EIGHT AND 26/100 DOLLARS (\$338.26), due from him on account, to-wit; the 31st day of March, 1961, which sum of money with the interest thereon, is still unpaid.

II

The Plaintiff claims of the Defendant THREE HUNDRED THIRTY-EIGHT AND 26/100 DOLLARS (\$338.26), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit; the 31st day of March, 1961, which sum of money with interest thereon is still unpaid.

paid.



DUCK AND LACEY, Attorneys for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof, an itemized statement of account verified by LESTER E. CARROLL, III, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 31st day of March, 1961, and due at present.

The Defendant resides at Bay Minette, Alabama.

FILED
MAR 30 1964
ALICE L. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon H. F. BROWN, INDIVIDUALLY, AND

H. F. BROWN d/b/a BAY DINER

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 H. F. BROWN,
INDIVIDUALLY, AND H. F. BROWN d/b/a BAY DINER Defendant

by -----
SUGAR & COFFEE SERVICE, An Alabama Corporation Plaintiff

Witness my hand this 30 day of March 1964

64-3-30-64

Wm. J. Duck, Clerk

No. 5993 Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

Sugar & Coffee Service
Jan Qba Corp

Plaintiffs

vs.

H. J. Brown

Defendants

Summons and Complaint

Filed _____ 19____

FILED

MAR 30 1994

Clerk

ALICE J. DICK, CLERK
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Bay Minette, Alabama

Received In Office

3/30 1964

_____, Sheriff

I have executed this summons

this March 30 1964

by leaving a copy with

H. J. Brown

Hubert Williams Sheriff

R. A. Zebert Deputy Sheriff

orn

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DATE:

Message - Reply

THIS IS NCR (NO CARBON REQUIRED) PAPER.

JUST TYPE (OR WRITE) ON ORIGINAL. YOUR IMPRESSION
WILL AUTOMATICALLY APPEAR ON COPIES BENEATH.

Form 83 New England Business Services, Inc., Townsend, Mass.

SIGNED:

DATE OF REPLY:

REPLY TO

SIGNED:

RECIPIENT: WRITE REPLY. RETURN WHITE TO SENDER. KEEP THIS PINK COPY.


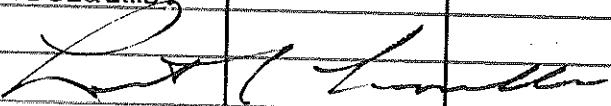
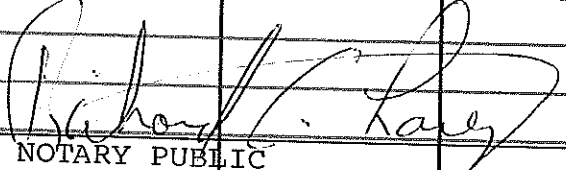
Sugar & Coffee Service

CORPORATION

MOBILE, ALABAMA

51-53 S. COMMERCE ST. HE 2-0786

- H. F. Brown dba
- BAY DINER
- Bay Minette, Alabama

DATE	INVOICE NO.	DEBIT	CREDIT	BALANCE
3-31-61				\$ 338.26
I, LESTER E. CARROLL III, PRESIDENT OF SUGAR & COFFEE SERVICE CORPORATION CERTIFY THAT ABOVE ACCOUNT IS JUST AND OWING AND THERE ARE NO SET OFFS OR COUNTER CLAIMS.				
SUGAR & COFFEE SERVICE CORPORATION  Lester E. Carroll III President				
The above is a just and accurate account of the amount owed Sugar & Coffee Service, a cor- poration, after allowance for any and all set- offs and counterclaims. 				
Sworn to and subscribed before me this 27th day of March, 1964.  NOTARY PUBLIC				
87				