

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 AUDIE BROWN, d/b/a Brown's Grocery, to appear and plead, answer or demur, within thirty days from the service of this writ, to a Bill of Complaint filed against him by BARBER PURE MILK COMPANY, a Corporation, in the Circuit Court, at Law, for said County and State.

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

Witness my hand this the 5 day of August, 1964.

Deice J. Duck
REGISTER

BARBER PURE MILK COMPANY,
a Corporation,

Plaintiff

-vs-

AUDIE BROWN, d/b/a BROWN'S
GROCERY,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 6140

COUNT ONE:

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED FIFTY-THREE and 04/100 (\$453.04) DOLLARS due from him by account from March 25, 1963 to December 30, 1963, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED FIFTY-THREE and 04/100 (\$453.04) DOLLARS due from him for merchandise furnished to Defendant by Plaintiff, at his request, from March 25, 1963 to December 30, 1963, which sum of money, with the interest thereon, is still unpaid.

James L. Baile
Attorney for Plaintiff

64-8-6-64

FILED

AUG 5 1964

69

ALICE L. DUCK, CLERK
REGISTER

MD. 6148

BILL OF COMPLAINT

BARBER PURE MILK COMPANY,
a Corporation,

Plaintiff

-vs-

AUDIE BROWN, d/b/a BROWN'S
GROCERY,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. _____

Ernest M. Bailey, Attorney
for Plaintiff

Defendant may be served
in Stapleton, Alabama

FILED

AUG 5 1964

ALICE J. DUCK, CLERK
REGISTER

Received 5 day of Aug 1964
and on 7 day of Aug 1964
served a copy of the within
on Audie Brown

By service on _____

TAYLOR WILKINS, Sheriff
By W. G. Talbert
Stapleton

Sheriff claims 221 miles at
Ten Cents per mile Total \$ 22.10
TAYLOR WILKINS, Sheriff
BY Talbert
DEPUTY SHERIFF

Miss Alice J. Ladd
November 3, 1964
Page Two

Let us know if we can be of further assistance.

Sincerely yours,

BARBER PURE MILK COMPANY
BARBER PURE MILK COMPANY, MOBILE

W. H. Willard, Jr.
W. H. Willard, Jr.
Manager

cc: Azalea Drive Dairy

CWP/C

FILED

4 1964
4 1964

ALL
CLERK
REGISTER

700. 6140

ERNEST M. BAILEY
ATTORNEY AT LAW
221 FAIRHOPE AVE.
FAIRHOPE, ALABAMA

BOX 161

August 4th, 1964

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

Re: Barber Pure Milk Co.,
vs. Audie Brown, d/b/a Brown's
Grocery

Dear Mrs. Duck:

I will appreciate you having service made on the
enclosed Bill Of Complaint in the above matter.

Thanking you in advance, I am

Very truly yours,

Ernest M. Bailey
Ernest M. Bailey
EMB/w