CHARLIE WILKERSON GAS CO, INC., a Corporation

Plaintiff

٧S

HOME CONSTRUCTION CORPORATION, a Corporation

Defendant

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 6233 6263

Comes now the Defendant and for answer to Plaintiff's complaint says:

1. Not guilty.

Sidney Harrell & Wilson Hayes, Attorneys for Defendant

Wilson Hayes

Defendant demands trial by Jury.

for Defendant

CHARLIE WILKERSON GAS COMPANY, INC., a corporation,

PLAINTIFF,

vs.

HOME CONSTRUCTION CORPORATION, a corporation, a foreign corporation,

DEFENDANT.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW, NO. 6263

## COMPLAINT

The Plaintiff claims of the Defendant THREE HUNDRED NINETY-FIVE DOLLARS (\$395.00), due from it by account on the 3rd day of July for merchandise, goods and chattels sold by the Plaintiff to the Defendant; and for work and labor done for the Defendant by the Plaintiff on, to-wit: the 3rd of July, 1964, at its request, which sum of money with interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is attached hereto as Exhibit A and made a part hereof.

JAMES W. HOWELL

Attorney for Plaintiff

FILED

OCT OF REGISTER

### EXHIBIT A

# STATE OF FLORIDA (COUNTY OF ESCAMBIA)

Before me, the undersigned authority in and for aforesaid State and County, who as a Notary Public under my seal of office is hereto attached, personally appeared Claude F. Allison known to me, who being duly sworn, upon his oath stated he is Secretary-Treasurer of Charlie Wilkerson Gas Company, Inc., a corporation organized and doing business under the laws of Florida ; that as such he makes this affidavit; that he is familiar with the books and business of Charlie Wilkerson Gas Company, Inc.; that the attached account against Home Construction Company is just and correct within the knowledge of this affiant; that he has authority to make this affidavit and that he has personal knowledge of the matters contained herein; that the items thereon stated and composing the said account were sold and delivered to the said Home Construction Company at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which said account is entitled as thereon stated and that the balance thereof amounting to the sum of Three Hundred Ninety-five Dollars (\$395.00) with interest from July 3, 1964 is justly due and remains unpaid.

Sworn to, subscribed, acknowledged, signed and sealed before me as a Notary Public under my seal of office, with my seal affixed on this the 23rd day of October, 1964.

Notary Public Escambia County, Florida

## Company, Gas

3510 MOBILE HIGHWAY

PENSACOLA, FLORIDA

"Your Gas Man" PHONE HEMLOCK 8-4681 OR 432-8393

NATURAL AND BUTANE GAS CONNECTING TAPPAN BANGES - COLEMAN FLOOR FURNACES

> Home Construction Company P. O. Box 7451 Mobile, Alabama

REMITTING PLEASE DETACH THIS COUPON AND MAIL WITH YOUR CHECK

DATE	DETAIL	CHARGES	CREDITS	BALANCE
	BALANCE BROUGHT FORWARD			
July 3,	1964 l Coleman 80M BTU Upflow Furnace with 7 outlets	\$395.00		\$395.00*

CHARLIE WILKERSON GAS CO., INC.

4				
STATE		of	ALABAMA	
	BALI	OWIN	COUNTY	

Circuit Court, Baldwin County

TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Home Construction Corporation, a corp. A

No 6263

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No. 6263 Page	-
STATE OF ALABAMA  Baldwin County	
CIRCUIT COURT	
CHARLIE WILKERSON GAS COMPANY,	A Corp
• <u> </u>	
Plaintiffs	;
201/h vs.	
HOME CONSTRUCTION CORPORATION,	
a foreign corp.	_
Defendants	- ; ;
SUMMONS AND COMPLAINT	
Filed 10-27- 19 64	
Alice J. Duck Clerk	7
RECEIVED	A TOTAL TOTA
OCT 28 1964	
Sheriff's office	•

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Received In Office
10/2719 4
19
Sheriff
I have executed this summons
this 1 of 29 1964
by leaving a copy with
Home Construction
Company, of
Sydney Motassell.
Italylare, agt
The state of the s
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R 1 R 1 1-00
Ralf J. B. W. G. Grents
O Bha
Deputy Sheriff