

STATE OF ALABAMA,
COUNTY OF BALDWIN.

Circuit Court, Baldwin Co-
No. _____ Term, 1964.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. R. PENNINGTON, individually, and doing business as PENNY'S SEAFOODS, 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 J. R. PENNINGTON, individually, and doing business as PENNY'S SEAFOODS, Defendant, by BON SECOUR FISHERIES, INC., a corporation, Plaintiff.

Witness my hand this 19 day of Nov, 1964.
Ollie J. Luck Clerk.

BON SECOUR FISHERIES,
INC., a corporation,

Plaintiff,

VS.

J. R. PENNINGTON, indi-
vidually, and doing business
as PENNY'S SEAFOODS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

6307

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant ONE HUNDRED NINETY-ONE AND 78/100 (\$191.78) DOLLARS due from him by account on, to-wit, the 28th day of December, 1963, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

Count II.

The Plaintiff claims of the Defendant ONE HUNDRED NINETY-ONE AND 78/100 (\$191.78) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 28th day of December, 1963; which sum of money with the interest thereon is still unpaid.

Cont'd, Summons and Complaint,
Bon Secour Fisheries, Inc. vs.
Penny's Seafoods.

Count III

The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETY-ONE AND 78/100 (\$191.78) DOLLARS due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant between the 1st day of November, 1963, and the 23rd day of December, 1963; which sums of money, with the interest thereon, are still unpaid.



E. G. RICKARBY, Attorney
for Plaintiff.

FILED

NOV 19 1964

ALICE I. BUCK, CLERK
REGISTER

BON SECOUR FISHERIES, INC.

TELEPHONE AREA CODE 205 WHITEHALL 3-8551 BON SECOUR, ALABAMA

VERIFICATION FOR ITEMIZED STATEMENT OF ACCOUNT

STATE OF ALABAMA

COUNTY OF BALDWIN

Before me, the undersigned Notary Public, in and for said county, in said state, personally appeared John Ray Nelson, who being first duly sworn, deposes and says that he is president for Bon Secour Fisheries, Inc., who is a corporation.

That as such John Ray Nelson, affiant has knowledge of the account owed to Bon Secour Fisheries, Inc. by Penny's Seafoods (J.R. Pennington).

That the attached itemized statement is a true and correct statement of the account owed by Penny's Seafood to Bon Secour Fisheries, Inc.

That there is now owing by Penny's Seafood to Bon Secour Fisheries, Inc. the sum of \$191.78, with interest from the 28th day of December, 1963, after allowing all credits.

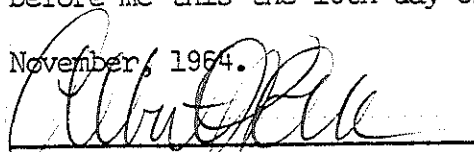
BON SECOUR FISHERIES, INC.


John Ray Nelson
President

Subscribed and sworn to

before me this the 10th day of

November, 1964.


Albert J. Rea

391

My commission expires January 16, 1965

A

NAME Penny's Seafoods
ADDRESS 23 South Section St.
CITY Fairhope, Alabama

| DATE | REFERENCE | | BALANCE |
|----------|-----------|-----------------|---------|
| | | BALANCE FORWARD | 10.00 |
| NOV 762 | 1,423 | 10.00- | .00 |
| NOV 1962 | 3,010 | 25.00+ | 25.00 |
| NOV 2762 | 3,066 | 22.50+ | 47.50 |
| NOV 3062 | 3,097 | 24.00+ | 71.50 |
| DEC 1462 | 3,183 | 30.00- | 41.50 |
| DEC 2162 | 3,234 | 45.10+ | 86.60 |
| DEC 2262 | 3,242 | 38.50+ | 125.10 |
| MAR 563 | 348 | 50.00- | 75.10 |
| MAR 2663 | 470 | 24.00- | 51.10 |
| JUN 1763 | 3,779 | 1.10- | .00 |
| JUN 2763 | 2,814 | | 1.00 |
| AUG 563 | 4,000 | 28.00- | .00 |
| NOV 163 | 4,645 | 21.00+ | 21.00 |
| NOV 1363 | 4,748 | 14.00+ | 35.00 |
| NOV 1563 | 4,758 | 28.00+ | 63.00 |
| NOV 2063 | 6,933 | 21.00+ | 84.00 |
| NOV 2263 | 7,016 | 21.00+ | 105.00 |
| NOV 2763 | 6,961 | 28.00+ | 133.00 |
| DEC 1363 | 7,148 | 25.20+ | 158.20 |
| DEC 2363 | 4,963 | 43.58+ | 201.78 |
| DEC 2863 | 7,311 | 10.00- | 191.78 |

INVOICE

BON SECOUR FISHERIES, INC.

Phone Foley, Alabama Area Code 205 Whitehall 3-8551

N^o 4645

Bon Secour, Alabama

19

SOLD TO

| | | | | | |
|---|--------|-------------------|-----------|------|-------|
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | | | @ | | |
| | Bbls. | Select Shell | Oysters @ | | |
| | Sacks | Select Shell | Oysters @ | | |
| 3 | Gals. | Standard | Oysters @ | 7.00 | 21.00 |
| | Pts. | Standard | Oysters @ | | |
| | 12 Oz. | Standard | Oysters @ | | |
| | ½ Pts. | Standard | Oysters @ | | |
| | Gals. | Extra Select | Oysters @ | | |
| | Gals. | Select | Oysters @ | | |
| | Pts. | Select | Oysters @ | | |
| | 12 Oz. | Select | Oysters @ | | |
| | ½ Pts. | Select | Oysters @ | | |
| | Lbs. | Claw Crab Meat | @ | | |
| | Lbs. | Special Crab Meat | @ | | |
| | Lbs. | Lump Crab Meat | @ | | |
| | | Scallops | @ | | |
| | Lbs. | Mullet | @ | | |
| | Lbs. | Mullet | @ | | |
| | Lbs. | Flounder | @ | | |
| | Lbs. | Flounder | @ | | |
| | Lbs. | Trout | @ | | |
| | Lbs. | Snapper | @ | | |
| | Lbs. | Snapper | @ | | |
| | Lbs. | Grouper | @ | | |
| | Lbs. | Panfish | @ | | |
| | | | @ | | |
| | | | @ | | |

FREIGHT

NOV 2

Ent'd

TOTAL

21.00

Received By

Jean Pennington

INVOICE

BON SECOUR FISHERIES, INC.

Phone Foley, Alabama Area Code 205 Whitehall 3-8551

Nº 4748

Bon Secour, Alabama

11-13-63

SOLD TO

Penny's Seafood

| | | | | |
|---------|-------------------|-----------|------|-------|
| Lbs. | | Shrimp @ | | |
| Lbs. | | Shrimp @ | | |
| Lbs. | | Shrimp @ | | |
| Lbs. | | Shrimp @ | | |
| Lbs. | | Shrimp @ | | |
| Lbs. | | Shrimp @ | | |
| Lbs. | | Shrimp @ | | |
| Lbs. | | Shrimp @ | | |
| | | @ | | |
| Bbls. | Select Shell | Oysters @ | | |
| Sacks | Select Shell | Oysters @ | | |
| 2 Gals. | Standard | Oysters @ | 7.00 | 14.00 |
| Pts. | Standard | Oysters @ | | |
| 12 Oz. | Standard | Oysters @ | | |
| ½ Pts. | Standard | Oysters @ | | |
| Gals. | Extra Select | Oysters @ | | |
| Gals. | Select | Oysters @ | | |
| Pts. | Select | Oysters @ | | |
| 12 Oz. | Select | Oysters @ | | |
| ½ Pts. | Select | Oysters @ | | |
| Lbs. | Claw Crab Meat | @ | | |
| Lbs. | Special Crab Meat | @ | | |
| Lbs. | Lump Crab Meat | @ | | |
| | Scallops | @ | | |
| Lbs. | Mullet | @ | | |
| Lbs. | Mullet | @ | | |
| Lbs. | Flounder | @ | | |
| Lbs. | Flounder | @ | | |
| Lbs. | Trout | @ | | |
| Lbs. | Snapper | @ | | |
| Lbs. | Snapper | @ | | |
| Lbs. | Grouper | @ | | |
| Lbs. | Panfish | @ | | |
| | @ | | | |
| | @ | | | |
| | FREIGHT | | | |
| | TOTAL | | | 14.00 |

NOV 14 1963
 Received By Jean Pennington

INVOICE

BON SECOUR FISHERIES, INC.

Phone Foley, Alabama Area Code 205 Whitehall 3-8551

Nº 4758

Bon Secour, Alabama

11-15-

1963

SOLD TO

Pennys Seafood

| | | | | | |
|---------|--------|-------------------|----------------|-------|--|
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | | | @ | | |
| | Bbls. | Select Shell | Oysters @ | | |
| | Sacks | Select Shell | Oysters @ | | |
| 4 | Gals. | Standard | Oysters @ 7.00 | 38.00 | |
| | Pts. | Standard | Oysters @ | | |
| | 12 Oz. | Standard | Oysters @ | | |
| | ½ Pts. | Standard | Oysters @ | | |
| | Gals. | Extra Select | Oysters @ | | |
| | Gals. | Select | Oysters @ | | |
| | Pts. | Select | Oysters @ | | |
| | 12 Oz. | Select | Oysters @ | | |
| | ½ Pts. | Select | Oysters @ | | |
| | Lbs. | Claw Crab Meat | @ | | |
| | Lbs. | Special Crab Meat | @ | | |
| | Lbs. | Lump Crab Meat | @ | | |
| | | Scallops | @ | | |
| | Lbs. | Mullet | @ | | |
| | Lbs. | Mullet | @ | | |
| | Lbs. | Flounder | @ | | |
| | Lbs. | Flounder | @ | | |
| | Lbs. | Trout | @ | | |
| | Lbs. | Snapper | @ | | |
| | Lbs. | Snapper | @ | | |
| | Lbs. | Grouper | @ | | |
| | Lbs. | Panfish | @ | | |
| | | | @ | | |
| | | | @ | | |
| FREIGHT | | | | | |
| TOTAL | | | | 38.00 | |

NOV 16 ENT'D

Received By

Jean Pennington

INVOICE

BON SECOUR FISHERIES, INC.

Phone Foley, Alabama Area Code 205 Whitehall 3-8551

Nº 6933

Bon Secour, Alabama,

11-20-63

SOLD TO

Pennys Food

| | | | | | |
|---|--------|--------------|---------------------|------|-------|
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | | | @ | | |
| | Bbls. | Select Shell | Oysters @ | | |
| | Sacks | Select Shell | Oysters @ | | |
| 3 | Gals. | Standard | Oysters @ | 7.00 | 21.00 |
| | Pts. | Standard | Oysters @ | | |
| | 12 Oz. | Standard | Oysters @ | | |
| | ½ Pts. | Standard | Oysters @ | | |
| | Gals. | Extra Select | Oysters @ | | |
| | Gals. | Select | Oysters @ | | |
| | Pts. | Select | Oysters @ | | |
| | 12 Oz. | Select | Oysters @ | | |
| | ½ Pts. | Select | Oysters @ | | |
| | Lbs. | | Claw Crab Meat @ | | |
| | Lbs. | | Special Crab Meat @ | | |
| | Lbs. | | Lump Crab Meat @ | | |
| | | | Scallops @ | | |
| | Lbs. | | Mullet @ | | |
| | Lbs. | | Mullet @ | | |
| | Lbs. | | Flounder @ | | |
| | Lbs. | | Flounder @ | | |
| | Lbs. | | Trout @ | | |
| | Lbs. | | Snapper @ | | |
| | Lbs. | | Snapper @ | | |
| | Lbs. | | Grouper @ | | |
| | Lbs. | | Panfish @ | | |
| | | | @ | | |
| | | | @ | | |

FREIGHT

Jean Pennington

21.00

Received By

BT

INVOICE

BON SECOUR FISHERIES, INC.

Phone Foley, Alabama Area Code 205 Whitehall 3-8551

N^o 7016

Bon Secour, Alabama

1963

SOLD TO

| | | | | | |
|---|--------|-------------------|---------|---|------------|
| | Lbs. | Shrimp | @ | | |
| | Lbs. | Shrimp | @ | | |
| | Lbs. | Shrimp | @ | | |
| | Lbs. | Shrimp | @ | | |
| | Lbs. | Shrimp | @ | | |
| | Lbs. | Shrimp | @ | | |
| | Lbs. | Shrimp | @ | | |
| | Lbs. | Shrimp | @ | | |
| | | | @ | | |
| | Bbls. | Select Shell | Oysters | @ | |
| | Sacks | Select Shell | Oysters | @ | |
| 3 | Gals. | Standard | Oysters | @ | 7.00 21.00 |
| | Pts. | Standard | Oysters | @ | |
| | 12 Oz. | Standard | Oysters | @ | |
| | ½ Pts. | Standard | Oysters | @ | |
| | Gals. | Extra Select | Oysters | @ | |
| | Gals. | Select | Oysters | @ | |
| | Pts. | Select | Oysters | @ | |
| | 12 Oz. | Select | Oysters | @ | |
| | ½ Pts. | Select | Oysters | @ | |
| | Lbs. | Claw Crab Meat | @ | | |
| | Lbs. | Special Crab Meat | @ | | |
| | Lbs. | Lump Crab Meat | @ | | |
| | | Scallops | @ | | |
| | Lbs. | Mullet | @ | | |
| | Lbs. | Mullet | @ | | |
| | Lbs. | Flounder | @ | | |
| | Lbs. | Flounder | @ | | |
| | Lbs. | Trout | @ | | |
| | Lbs. | Snapper | @ | | |
| | Lbs. | Snapper | @ | | |
| | Lbs. | Grouper | @ | | |
| | Lbs. | Panfish | @ | | |
| | | | @ | | |
| | | | @ | | |
| | | FREIGHT | | | |
| | | TOTAL | | | 21.00 |

Received By

Jean Pennington

INVOICE

BON SECOUR FISHERIES, INC.

Phone Foley, Alabama Area Code 205 Whitehall 3-8351

N^o 6961

Bon Secour, Alabama

11-27-63

SOLD TO

Pennington

| | | | | | |
|---|--------|-------------------|-----------|------|-------|
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Lbs. | | Shrimp @ | | |
| | Bbls. | Select Shell | Oysters @ | | |
| | Sacks | Select Shell | Oysters @ | | |
| 4 | Gals. | Standard | Oysters @ | 7.00 | 28.00 |
| | Pts. | Standard | Oysters @ | | |
| | 12 Oz. | Standard | Oysters @ | | |
| | ½ Pts. | Standard | Oysters @ | | |
| | Gals. | Extra Select | Oysters @ | | |
| | Gals. | Select | Oysters @ | | |
| | Pts. | Select | Oysters @ | | |
| | 12 Oz. | Select | Oysters @ | | |
| | ½ Pts. | Select | Oysters @ | | |
| | Lbs. | Claw Crab Meat | @ | | |
| | Lbs. | Special Crab Meat | @ | | |
| | Lbs. | Lump Crab Meat | @ | | |
| | | Scallops | @ | | |
| | Lbs. | Mullet | @ | | |
| | Lbs. | Mullet | @ | | |
| | Lbs. | Flounder | @ | | |
| | Lbs. | Flounder | @ | | |
| | Lbs. | Trout | @ | | |
| | Lbs. | Snapper | @ | | |
| | Lbs. | Snapper | @ | | |
| | Lbs. | Grouper | @ | | |
| | Lbs. | Panfish | @ | | |
| | | | @ | | |
| | | | @ | | |
| | | FREIGHT | | | |
| | | TOTAL | | | 28.00 |

Received By

John Pennington
for

INVOICE

BON SECOUR FISHERIES, INC.

Phone Foley, Alabama Area Code 205 Whitehall 3-8551

N^o 7148

Bon Secour, Alabama.

SOLD TO

| | | | | | | |
|-------------|----------|-------------------|---------|---------|------|-------|
| | Lbs. | | Shrimp | @ | | |
| | Lbs. | | Shrimp | @ | | |
| | Lbs. | | Shrimp | @ | | |
| | Lbs. | | Shrimp | @ | | |
| | Lbs. | | Shrimp | @ | | |
| | Lbs. | | Shrimp | @ | | |
| | Lbs. | | Shrimp | @ | | |
| | Lbs. | | Shrimp | @ | | |
| | | | | @ | | |
| | Bbls. | Select Shell | Oysters | @ | | |
| | Sacks | Select Shell | Oysters | @ | | |
| 3 | Gals. | Standard | Oysters | @ | 2.00 | 31.00 |
| | Pts. | Standard | Oysters | @ | | |
| | 12 Oz. | Standard | Oysters | @ | | |
| | 1/2 Pts. | Standard | Oysters | @ | | |
| | Gals. | Extra Select | Oysters | @ | | |
| | Gals. | Select | Oysters | @ | | |
| | Pts. | Select | Oysters | @ | | |
| | 12 Oz. | Select | Oysters | @ | | |
| | 1/2 Pts. | Select | Oysters | @ | | |
| | Lbs. | Claw Crab Meat | @ | | | |
| | Lbs. | Special Crab Meat | @ | | | |
| | Lbs. | Lump Crab Meat | @ | | | |
| | | Scallops | @ | | | |
| | Lbs. | Mullet | @ | | | |
| | Lbs. | Mullet | @ | | | |
| | Lbs. | Flounder | @ | | | |
| | Lbs. | Flounder | @ | | | |
| | Lbs. | Trout | @ | | | |
| | Lbs. | Snapper | @ | | | |
| | Lbs. | Snapper | @ | | | |
| | Lbs. | Grouper | @ | | | |
| 42 | Lbs. | Panfish | @ | 10 | | 4.50 |
| | | | @ | | | |
| | | | @ | | | |
| DEC 13 1963 | | | | FREIGHT | | |
| | | | | TOTAL | | 25.50 |

Received By

James S. Sington

INVOICE

BON SECOUR FISHERIES, INC.

Phone Foley, Alabama Area Code 205 Whitehall 3-8551

N^o 4963

Bon Secour, Alabama,

12-23-1963

SOLD TO

Penny's Seafood

| | | | | |
|----|----------|------------------------|------|-------|
| | Lbs. | Shrimp @ | | |
| | Lbs. | Shrimp @ | | |
| | Lbs. | Shrimp @ | | |
| | Lbs. | Shrimp @ | | |
| | Lbs. | Shrimp @ | | |
| | Lbs. | Shrimp @ | | |
| | Lbs. | Shrimp @ | | |
| | Lbs. | Shrimp @ | | |
| | Lbs. | Shrimp @ | | |
| | Lbs. | Shrimp @ | | |
| | Bbls. | Select Shell Oysters @ | | |
| | Sacks | Select Shell Oysters @ | | |
| 4 | Gals. | Standard Oysters @ | 7.00 | 28.00 |
| | Pts. | Standard Oysters @ | | |
| | 12 Oz. | Standard Oysters @ | | |
| | 1/2 Pts. | Standard Oysters @ | | |
| | Gals. | Extra Select Oysters @ | | |
| 1 | Gals. | Select Oysters @ | 2.50 | 2.50 |
| | Pts. | Select Oysters @ | | |
| | 12 Oz. | Select Oysters @ | | |
| | 1/2 Pts. | Select Oysters @ | | |
| | Lbs. | Claw Crab Meat @ | | |
| | Lbs. | Special Crab Meat @ | | |
| | Lbs. | Lump Crab Meat @ | | |
| | | Scallops @ | | |
| | Lbs. | Mullet @ | | |
| 63 | Lbs. | Mullet @ | .06 | 3.78 |
| | Lbs. | Flounder @ | | |
| | Lbs. | Flounder @ | | |
| | Lbs. | Trout @ | | |
| | Lbs. | Snapper @ | | |
| | Lbs. | Snapper @ | | |
| | Lbs. | Grouper @ | | |
| 33 | Lbs. | Panfish @ | .10 | 3.30 |
| | | @ | | |
| | | @ | | |
| | | FREIGHT | | |
| | | TOTAL | | 40.58 |

Received By

Penny's Seafood

br

Original

Case No 6307

Bon Secour Fisheries
Inc. a corp -
Pltf.

vs.

J. R. Pennington ind.
& d/b/a Penny's
Seafoods

Def't.

FILED
NOV 19 1964
ALICE J. DUCK, CLERK
REGISTER

E. D. Bickarby

Received 19 day of Nov 1964
d on 27 of Nov 1964
served a copy of this within 2 9
J. R. Pennington
service on J. R. Pennington
Taylor Wilkins
TAYLOR WILKINS, Sheriff
By Roy Randall D.S.
Sheriff claims 70 miles at
Ten Cents per mile Total 7.00
TAYLOR WILKINS, Sheriff
BY RR
DEPUTY SHERIFF

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532

November 18, 1964

6307

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

Dear Mrs. Duck:

Inre: Bon Secour Fisheries, Inc.
Vs: Penny's Seafoods
Our File: 64-272

With this we are sending you summons and complaint in the above styled cause. The plaintiff is an Alabama corporation so we are not sending costs. Please process, hand to sheriff, and advise when defendant has been served.

Thanks.

Yours very truly,



ts
Encl.
cc: Dun & Bradstreet, Inc.