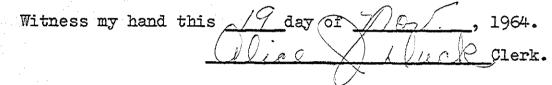
STATE OF ALABAMA, COUNTY OF BALDWIN.

	Court,	Baldwin	Co∓
No.		Tem	<u>,1</u> 964.
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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.



BON SECOUR FISHERIES, INC., a corporation, Plaintiff,	IN THE CIRCUIT COURT	OF
J. R. PENNINGTON, indi- vidually, and doing business as PENNY'S SEAFOODS, Defendant.	BALDWIN COUNTY, ALABA AT LAW. O O	MA,

COMPLAINT

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.

FILE DINA, REESERER

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

Albert J. Rea

ember/1964

391

My commission expires January 16, 1965

Penny's Seafoods

ADDRESS.

23 South Section St.

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	Lbs.	Lump	Crab Meat	<u>@</u>				
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	Lbs.		∖Mullet	@	<u> </u>			
	Lbs.	e. Periodo y kanga naka (1870) na tanga tangan dan sahah kanggapakka na manananan mananan sahan sahan sahan sahan	Mullet	@	1			<u> </u>
	Lbs.		Flounder	(a)	1		# 18 FF VA PANISH # BORDS A VANAS 197 *	
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	Lbs.	Martin	Snapper	@				
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	Lbs.		Panfish	@	V			
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	Lbs.		Shrimp / @		- A Marie and A Ma	
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	Gals.	Select	Oysters @		,	
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Phone Foley, Alabama Area Code 205 WHitehall 3-8551

-23-1,63 $M\dot{o}$ 4963 Bon Secour, Alabama, Lbs. Shrimp @ Lbs. Shrimp @ Lbs. Shrimp (a) Lbs, Shrimp (a) Lbs. Shrimp @ Lbs. Shrimp @ Lbs. Shrimp @ Lbs. Shrimp @ Oysters @ Oysters @ Oysters @ Oysters @ 12 Queters @ 1/2 Oysters @ Gal Oysters 10 Gals, Oysters @ Pts. Select Oystey's @ 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 @ 330 Panfish @ . / () DEC 201963 FREIGHT TOTAL mi IT M Received By

Original Case No 6307 d on 27 0 of 100/1964 Bon Secour Fisheries Inc. a corp. erved a crop of the within & 9 Co service on R. Penning In J. R. Pennington ind. 4 Abla Penny's By Roy Randal D. B. Jen Cents por onto Total in John TAYLOR WILKING Sheriff Seafonds Bept. ALCE J. DUCK, CLERK REGISTER 6. S. Richarby

TELEPHONE 928-9836

E. G. RICKARBY

392 FAIRHOPE AVENUE FAIRHOPE, ALABAMA 36532

November 18, 1964



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.

ts

Yours very truly,

Encl.

cc: Dun & Bradstreet, Inc.