

AUDIE BROWN, d/b/a
BROWN'S GROCERY & MARKET
PLAINTIFF

VS

HERMAN BOYINGTON,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6532

1.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED EIGHT and 07/100 DOLLARS (\$308.07), due from him by account on the 27th day of November, 1964, which sum of money with the interest thereon, is still unpaid.

2.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED EIGHT and 07/100 DOLLARS (\$308.07), due from him by account on, to-wit, November 27, 1964, which sum of money with the 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.

WILTERS, BRANTLEY & NESBIT

By: Thyllis A. Nesbit

Attorney for the Plaintiff

STATE OF ALABAMA

COUNTY OF BALDWIN

Before me, June B. Hedge, a Notary Public, in
and for said County and State, personally appeared Mrs. A. H. Brown,
who being by me duly sworn, deposes and says, that she is Bookkeeper
for the firm of BROWNS GROCERY & MARKET;
that the annexed statement of the account of said firm against
HERMAN BOYINGTON of Bay Minette, in the State
Alabama, is just, true and correct; that there is now due
on said account the sum of \$ 308.07, after deducting all credits,
set-offs or counter-claims.

Mrs. A. H. Brown
Sworn to and subscribed before me this 26th day of May,
1965.

June B. Hedge
Notary Public,

376

FILED
MAY 27 1965
ALICE I. HICK, CLERK
RECEIVED

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 HERMAN BOYINGTON

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 _____

_____ HERMAN BOYINGTON _____, Defendant _____

by _____ AUDIE BROWN, d/b/a _____

_____ BROWN'S GROCERY & MARKET _____, Plaintiff _____

Witness my hand this 27 day of May 1965

Ex-5-29-65 _____ W. J. Duck _____, Clerk

No. 12532

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

AUDIE BROWN, d/b/a

BROWN'S GROCERY & MARKET

Plaintiffs

vs.

HERMAN BOYINGTON

Defendants

Summons and Complaint

Filed _____ 19____

MAY 27 1965

ALICE J. DUCK, CLERK
ALICE J. DUCK, REGISTER

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Bay Minette, Alabama

Received In Office

May 27 1965

_____, Sheriff

I have executed this summons

this May 29 1965

by leaving a copy with

Herman Boyington

Taylor Wilkins Sheriff

W. A. Zeller Deputy Sheriff

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