

R. B. BARNETT, an
individual d/b/a
Barnett Radio and
Appliance Company,

Plaintiff,

VS:

T. O. BRILL and
WILLIE JAMES,

Defendants.

* IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
*

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NO. _____

COUNT ONE

The Plaintiff claims of the Defendants, separately and severally, ONE HUNDRED SEVENTY-EIGHT AND 40/100 (\$178.40) DOLLARS damages for the breach of a contract entered into by them on the 18th day of December, 1954, by which they promised separately and severally to pay to the Plaintiff the sum of TWO HUNDRED THIRTY AND 40/100 (\$230.40) DOLLARS in eighteen consecutive payments of TWELVE AND 80/100 (\$12.80) DOLLARS each, first payment becoming due and payable on the 18th day of January, 1955, and each successive installment payable on the same day of each and every month thereafter until the balance is paid in full. Said payments being the consideration for the purchase of a General Electric Refrigerator and General Electric Washing Machine and Plaintiff avers that the payment due and payable on the 18th day of July, 1955, and all successive payments have not been paid and Plaintiff further alleges that by the terms of said contract if any payment be not made then the entire balance of the contract is to become due and payable and the Plaintiff avers that said entire balance has become due and payable and the balance is ONE HUNDRED SEVENTY-EIGHT AND 40/100 (\$178.40) DOLLARS.

COUNT TWO

Plaintiff further claims of the Defendants,

separately and severally, an attorney's fee as provided in said contract as set out in Count One of this complaint. Said contract providing for a reasonable attorney's fee in the amount of 15% and Plaintiff further claims an attorney's fee in the amount of TWENTY-SEVEN AND 00/100 (\$27.00) DOLLARS.

COLLINS, GALLOWAY & MURPHY

BY: Thomas W. Galloway
Attorneys for the Plaintiff

Address of Defendants:

Route 1, Box 130A
Robertsdale, Alabama

R. B. BARNETT, an
individual d/b/a
Barnett Radio and
Appliance Company,

Plaintiff,

VS:

T. O. BRILL and
WILLIE JAMES,

Defendants.

* IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
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NO. _____

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COUNT ONE

The Plaintiff claims of the Defendants, separately and severally, ONE HUNDRED SEVENTY-EIGHT AND 40/100 (\$178.40) DOLLARS damages for the breach of a contract entered into by them on the 18th day of December, 1954, by which they promised separately and severally to pay to the Plaintiff the sum of TWO HUNDRED THIRTY AND 40/100 (\$230.40) DOLLARS in eighteen consecutive payments of TWELVE AND 80/100 (\$12.80) DOLLARS each, first payment becoming due and payable on the 18th day of January, 1955, and each successive installment payable on the same day of each and every month thereafter until the balance is paid in full. Said payments being the consideration for the purchase of a General Electric Refrigerator and General Electric Washing Machine and Plaintiff avers that the payment due and payable on the 18th day of July, 1955, and all successive payments have not been paid and Plaintiff further alleges that by the terms of said contract if any payment be not made then the entire balance of the contract is to become due and payable and the Plaintiff avers that said entire balance has become due and payable and the balance is ONE HUNDRED SEVENTY-EIGHT AND 40/100 (\$178.40) DOLLARS.

COUNT TWO

Plaintiff further claims of the Defendants,

COLLINS, GALLOWAY & MURPHY
ATTORNEYS AT LAW
FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

February 7, 1956

FRED G. COLLINS
THOMAS M. GALLOWAY
M. THOMAS MURPHY

Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

Re: R. B. Barnett
Vs: T. O. Brill, et al

Dear Mrs. Duck:

Would you please file the enclosed complaint
and notify me when said is filed.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

BY:


Thomas M. Galloway

TMG:MAH
Enc.

separately and severally, an attorney's fee as provided in said contract as set out in Count One of this complaint. Said contract providing for a reasonable attorney's fee in the amount of 15% and Plaintiff further claims an attorney's fee in the amount of TWENTY-SEVEN AND 00/100 (\$27.00) DOLLARS.

COLLINS, GALLOWAY & MURPHY

BY: Thomas W. Galloway
Attorneys for the Plaintiff

Address of Defendants:

Route 1, Box 130A
Robertsdale, Alabama

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,

BALDWIN COUNTY

No. 2848

CIRCUIT COURT, BALDWIN COUNTY

Baldwin Times

FEBRUARY

TERM, 19 56

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

T. O. BRILL and WILLIE JAMES

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

T. O. BRILL and WILLIE JAMES

by R.B. BARNETT, and individual d/b/a BARNETT RADIO AND APPLIANCE COMPANY

Witness my hand this 8 day of February 19 56

Clerk

ACCOUNT OF T. O. BRILL AND WILLIE JAMES:

TOTAL AMOUNT DUE *****DECEMBER 18, 1954*****\$230.40

AMOUNT PAID	DATE PAID
\$5.00	JANUARY 22, 1955
5.00	JANUARY 1,
5.00	DECEMBER 27
3.00	MAY 14
3.00	MAY 10
3.00	MAY 5
3.00	APRIL 7
5.00	APRIL 19
5.00	APRIL 1
5.00	MARCH 21
5.00	FEBRUARY 14
5.00	JUNE 18
25.00	MARCH 19, 1956
25.00	MARCH 30, 1956
25.00	APRIL 3, 1956

TOTAL AMOUNT PAID

\$127.00

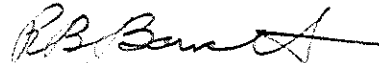
BALANCE DUE AND OWING

\$103.40

STATE OF ALABAMA:

COUNTY OF MOBILE:

Personally appeared before me the undersigned authority, R. B. Barnett, who by me being first duly sworn and who is known to me on oath says that he is the sole owner of Barnett Radio & Appliance Company and further sayeth on oath that the attached and foregoing statement of account of T. O. Brill and Willie James is true and correct and is past-due and owing in the amount of One Hundred ~~Fifty~~ three and 40/100 (\$103.40) Dollars.

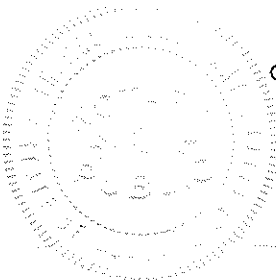


R. B. Barnett

Sworn to and subscribed before me on the 25th
day of July, 1956.



Notary Public, State of Alabama
at large.



SUMMONS AND COMPLAINT

CIRCUIT COURT, BALDWIN COUNTY

THE STATE OF ALABAMA,

BALDWIN COUNTY

No. 2848

FEBRUARY

TERM, 19 56.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

T. O. BRILL and WILLIE JAMES

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

T. O. BRILL and WILLIE JAMES, Defendant

by R.B. BARNETT, and individual a/o/a BARNETT RADIO AND APPLIANCE COMPANY
Plaintiff.....

Witness my hand this 9 day of February 19 56

Wingfield, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

R.B. BARNETT, and individual

d/b/a Barnett Radio and Appliance Co.

Plaintiffs

vs.

T. O. BRILL and Willie James

Address: Route 1, Box 130A

Robertsdale, Alabama

Defendants

SUMMONS and COMPLAINT

Filed February 8, 1956

Alice J. Duck, Clerk

THOMAS M. GALLOWAY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

_____, 19.....

_____, Sheriff

I have executed this summons

this _____, 19.....

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff