

3063

SUMMONS AND COMPLAINT

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon L. W. BRANNAN, JR. to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Pace Holland Co., a corporation.

WITNESS my hand this 30 day of May, 1957.

Dee J. Brantley  
Clerk

PACE HOLLAND COMPANY  
a corporation

PLAINTIFF

VS

L. W. BRANNAN, JR.  
d/b/a CHILDRESS MARKET

DEFENDANT

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

1.

The Plaintiff claims of the Defendant the sum of TWELVE HUNDRED AND THIRTY-NINE (\$1239.00) DOLLARS, due from him by account, on, to-wit, June 1, 1955, which sum of money with the interest thereon is still unpaid.

2.

The Plaintiff claims of the Defendant the sum of TWELVE HUNDRED AND THIRTY-NINE (\$1239.00) DOLLARS, due from him on account, stated between the Plaintiff and the Defendant on, to-wit, June 1, 1955, which sum of money with the interest thereon is still unpaid.

Wilters & Brantley  
Harry J. Wilters, Jr.  
Attorneys for the Plaintiff

Plaintiff demands a trial by jury.

Wilters & Brantley

BY: Harry J. Wilters, Jr.  
Attorneys for the Plaintiff

*Filed May 30, 1957*  
*Entered Aug. 3, 1957*

PAGE HOLLAND COMPANY,  
A Corporation,

Plaintiff,

vs.

L. W. BRANNAN, JR.  
d/b/a CHILDRESS MARKET,

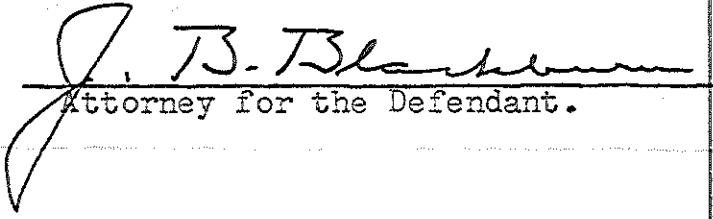
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW. NO. 3263.

PLEA

Now comes the Defendant and for answer to the Complaint and to each and every count thereof, separately and severally, assigns separately and severally, the following:

1. The allegations of the complaint are untrue.
2. The claim is barred by the Statute of Limitations of three years.

  
Attorney for the Defendant.