

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALAKAMA, GREETING:

You are hereby commanded to summon SAM STEWART, 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, Alabama, at Bay Minette, against SAM STEWART by THE GROLIER SOCIETY, INC.

Witness my hand this the day of June, 1957.

Clerk Clerk

%#%#%#%#%#%#%#%#%#%#%#%#%#%#%#%#%#%#

COMPLAINT

THE GROLIER SOCIETY, INC.,)
PLAINTIFF	IN THE CIRCUIT COURT OF
vs:) BALDWIN COUNTY, ALABAMA
SAM STEWART,	AT LAW
DEFENDANT	

COUNT I:

The plaintiff claims of the defendant ONE HUNDRED FORTY TWO & 95/100 DOLLARS (\$142.95), due from him by account on, to wit: the 12th day of September, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE HUNDRED FORTY TWO & 95/100 DOLLARS (\$142.95), due from him on account stated between the plaintiff and the defendant on, to wit: the 12th day of September, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE HUNDRED FORTY TWO & 95/100 DOLLARS (\$142.95), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 12th day of September, 1955, which sum of money, with interest thereon is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public which shows the amount due on this account as of the 14th day of April, 1957.

Defendant's address is: Rabun Road, Bay Minette, Alabama.

Attorney for Plaintiff

State of Pennsylvania, City of Philadelphia

(Interest to be computed from date of maturity of contract)

Before me, the subscriber A NOTARY PUBLIC FOR THE COMMONWEALTH			
OF PENNSYLVANIA, RESIDING IN THE CITY OF PHILADELPHIA			
personally appeared J. P. ROBERTSON, COLLECTION MANAGER			
who being duly sworn or affirmed, according to law, doth depose and say, that the annexed			
account against MR. AND MRS. SAM STEWART is correctly copied from the			
books of Original Entry of THE GROLIER SOCIETY INC.			
that the charges were made in said books at or about the time of their respective dates: that			
the goods for which said charges were made, were sold and delivered as charged: that the			
charges are correct and the account is just and true as stated: that there is now due and owing thereon			
the sum of ONE HUNDRED and TWENTY-SIX 50 Dollars,			
WITH INTEREST FROM MAY 10,1956 that no part of said			
sum has ever been paid or in any manner settled, and that there are no deductions or offsets of			
any kind, except such as are therein specified and credited.			
Sworn or affirmed to and subscribed before me, this 14th			
day of <u>April</u> A. D. 1957 .			
IN TESTIMONY WHEREOF, I have hereunto set my hand and official seal the			
day and year aforesaid. Living Saarba			
ALICIA S. GARBER			

Philadelphia, Phila. County

My Commission Expires April 11, 1961

Received A day of fund 1999 and on 15 day of lune 1952 and on 1952 on Standard on Standard on Standard	37-66
By service on	SUMMONS AND COMPLAINT
By W. A. Foller D. S. Pabon	THE GROLIER SOCIETY, INC.
Sheriff claims 22 miles at	PLAINTIFF VS:
TAYLOR WILKINS, Sheriff BY DEPUTY SHERIFF	SAM STEWART,
	DEFENDANT
	IN THE CIRCUIT COURT OF
	BALDWIN COUNTY, ALABAMA
	AT LAW
	FILED
	JUN 8 1957; AUCE & DUCK 1954;
	LAW OFFICE OF FOREST A. CHRISTIAN FOLEY, ALABAMA