

J. B. LAWRENCE,

Plaintiff,

Vs.

HOME GARDENS LAND COMPANY,
a Corporation,
Defendants.

Circuit Court of

Baldwin County, Alabama.

Plaintiff claims from the defendant the sum of \$5394.54 due from it by account of October 1, 1918, which sum of money, with the interest thereon, is still unpaid.

Second. Plaintiff claims of the defendant the sum of \$5394.54 due from it for work and labor done for the defendant by the plaintiff from November 1, 1911 to October 1, 1918, at defendant's request, which sum of money, with the interest thereon, is due and unpaid.

The above suit is based upon an itemized, verified statement of the account and which said itemized, verified statement is herewith filed.

Chas Haeck
Gordon & Edington
Attorneys for the Plaintiff.

Dyas, Alabama, October 1st, 1918

Home Gardens Land Company, a corporation,

To-

J.B.Lawrence,

Dr.

To salary for services rendered said
corporation as General Manager from
November 1st, 1911 to October 1st, 1918 -
83 months @ \$200.00 per month.....\$16,000.00

CREDITS:

1912-April 2, By cash	\$ 200.00
May 25, " "	50.00
June 17, " "	250.00
July 11, " "	52.46
August 9, " "	45.17
Sept. 28, " "	400.00
Dec. 7th " "	220.00
Dec. 24, " "	500.00
1913-February 13, By cash	300.00
March 7th " "	400.00
1914-December 31st " "	440.00
1915-June 30th " "	14.91
December 27th " "	230.50
1916-February 29th " "	50.00
June 30th " "	1,000.00
August 31st " "	75.00
October 31st, " "	177.45
November 30th, " "	500.00
December 31st " "	1,700.00
1917-March 31st " "	275.00
June 30th " "	24.20
November 30th " "	500.00
December 31st " "	1,500.00
1918-March 18th " "	70.75
April 3rd " "	200.00
June 10th " "	33.96
August 29th " "	1,296.04
September 28th " "	700.00
	<u>\$11,205.46</u>

Balance due J.B.Lawrence October 1st, 1918

\$5,394.54

The State of Alabama, :

Baldwin County. :

Before me, *Cornelia Hall*,

Notary Public in and for said County and State, personally
appeared J.B.Lawrence, a competent witness, who being first
duly sworn, doth depose and say, that he is the general manager
of the Home Gardens Land Company, a corporation; that he knows
from his own personal knowledge that the foregoing account, and
each item thereof is true and correct, and that the amount there-
of, to-wit: \$5,394.54 with the interest thereon, is still due
from the Home Gardens Land Company, a corporation, to the said
J.B.Lawrence, and is unpaid.

Subscribed and sworn to before
me this 9th, day of October, 1918.

Cornelia Hall
Notary Public, Baldwin County, Alabama.

The State of Alabama,
BALDWIN COUNTY.

No.

Circuit Court

..... Fall Term 191 8

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon Home Gardens Land Company, a Corporation,

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 them the Defendant s

by J. B. Lawrence, Plaintiff

Witness my hand this 14th day of October 191 8

T. W. Reilman Clerk.

COMPLAINT

Plaintiff Versus

The Plaintiff claims of the Defendant

..... Dollars due by

Plaintiff's Attorney.

Original

No.

State of Alabama,
BALDWIN COUNTY.

Circuit Court

J. B. LAWRENCE

vs.

Plaintiffs

Home Gardens Land

Company, a Corporation
Defendants

SUMMONS AND COMPLAINT

Filed October 14th 1918

D. W. RICHMOND Clerk

Defendant lives at

Dyers, Ala.

Chas. Hall,

Gordon and Washington
Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette.

Received in office

October 14th 1918

L. E. EUBANKS Sheriff

I have executed this Writ

this 18th day of October 1918
by delivering a copy of the within summons and complaint

J. B. Lawrence, Secy
Treas and Genl Mgrs
of the Home Gardens
Land Company, Inc. by
delivering a copy of the within
summons and Complaint
to H. M. Lawrence,
Vice President of the
Home Gardens Land
Company, a Corporation,
on the same day,

L. E. EUBANKS Sheriff

Deputy Sheriff.

VS.

Circuit Court of
Baldwin County, Alabama.

The above suit is based upon an itemized, verified statement of the account and which said itemized, verified statement is herewith filed.

Chas. Hacc' +
Gordon Edington

Attorneys for the Plaintiff.

Dyas, Alabama, October 1st, 1918

HOME GARDENS LAND COMPANY, a corporation,

To-

J.B.Lawrence,

Dr.

To salary for services rendered said corporation as general manager from November 1st, 1911, to October 1, 1918- 88 months @ \$200.00 per month.....\$16,000.00

CREDITS.

1912, April 2.	By cash	
May 25	" "	\$200.00
June 17	" "	50.00
July 11	" "	250.00
August 9	" "	52.46
Sept. 28	" "	45.17
Dec. 7th	" "	400.00
Dec. 24	" "	220.00
1913, Feby. 13	" "	500.00
March 7.	" "	300.00
1914 Dec. 31	" "	400.00
1915 June 30	" "	440.00
Dec. 27	" "	14.91
1916, Feby. 29	" "	230.50
June 30	" "	50.00
Aug. 31	" "	1000.00
Oct. 31	" "	75.00
Nov. 30	" "	177.45
Dec. 31	" "	500.00
1917, March 31	" "	1700.00
June 30	" "	275.00
Nov. 30	" "	24.20
Dec. 31	" "	500.00
1918, Mch. 18	" "	1500.00
Apr. 8	" "	70.75
June 10	" "	200.00
Aug. 29	" "	38.96
Sept. 28	" "	1296.04
		700.00

\$11,205.46

Balance due J.B.Lawrence Oct. 1, 1918

\$5,394.54

The State of Alabama, :
Baldwin County. :

Before me, Cornelia Hall, a Notary Public in and for said County and State, personally appeared J.B.Lawrence, a competent witness, who being first duly sworn, doth depose and say, that he is the general manager of the Home Gardens Land Company, a corporation; that he knows from his own personal knowledge that the foregoing account, and each item thereof is true and correct, and that the amount thereof, to-wit: \$5,394.54 with the interest thereon, is still due from the Home Gardens Land Company, an incorporation, to the said J.B.Lawrence, and is unpaid.

Subscribed and sworn to
before me this 9th day of
October, 1918.

J.B.Lawrence.

Cornelia Hall, Notary Public,
Baldwin County, Ala. (Seal)

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The State of Alabama,
BALDWIN COUNTY.

Circuit Court

No.

Fall Term 191*f*

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon

Home Gardens Land
Company a Corporation

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

It

Defendant

by

J. B. Lawrence

Plaintiff

Witness my hand this

14th day of *October*

191*f*

T. W. Rickerson

Clerk

COMPLAINT

Plaintiff Versus

The Plaintiff claims of the Defendant

Dollars due by

Plaintiff's Attorney.

The State of Alabama,
BALDWIN COUNTY.

Circuit Court

No.

Fall Term 1918

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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

It

Defendant.

by

J. B. Lawrence

Plaintiff

Witness my hand this

14th day of October 1918

T. W. Richerson

Clerk.

COMPLAINT

Plaintiff Versus

The Plaintiff claims of the Defendant

Dollars due by

Plaintiff's Attorney.

No.

State of Alabama,
BALDWIN COUNTY.

Circuit Court

J. B. Lawrence

vs.

Plaintiffs

Home Gardens Land
Co., a corp.

Defendants

SUMMONS AND COMPLAINT

Filed 191

Clerk

Defendant lives at

Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette.

Received in office

191

Sheriff

I have executed this Writ

this 191

by leaving a copy of the within summons and complaint with

Sheriff

Deputy Sheriff.