

The State of Alabama, }
BALDWIN COUNTY.

Circuit Court

No.

Fall Term 1919 191.....

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon.....

J. B. Stuart

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 him as Defendant.....

by Henry H. Clarke and J. B. Davis, as partners doing business under
the firm name and style of Clarke, Davis & Co., Plaintiff

Witness my hand this 9th day of July 1919.

Clerk.

COMPLAINT.

as partners
Henry H. Clarke and J. B. Davis, doing business
under the firm name and style of,
Clarke, Davis & Co.,

Plaintiff.

vs.

J. B. Stuart,

Defendant.

1. The plaintiff claims of the defendant the sum of Eleven Hundred and twenty-five 96/100 Dollars due from him by account, on to wit: the 27th day of June 1919
2. The plaintiff claims of the defendant the sum of Eleven Hundred and twenty-five 96/100 Dollars for money loaned by the plaintiff to the defendant on, to wit: the 27th day of June 1919.
2. The plaintiff claims of the defendant the sum of Eleven Hundred and twenty-five 96/100 Dollars on account stated between the plaintiff and defendant, on, to wit: the 27th day of June 1919.
4. The plaintiff claims of the defendant the sum of Eleven Hundred and twenty-five 96/100 Dollars for merchandise, goods and chattels sold by the plaintiff to the defendant, on to wit: the 27th day of June 1919.
5. The plaintiff claims of the defendant the sum of Eleven Hundred and twenty-five 96/100 Dollars for money paid by the plaintiff for the defendant on. to wit; the 27th day of June 1919 at his request.
6. The plaintiff claims of the defendant the sum of Eleven Hundred and twenty-five 96/100 Dollars for work and labor done for the defendant by the plaintiff on, to wit; the 27th day of June 1919 at his request.
7. The plaintiff claims of the defendant the sum of Eleven Hundred and twenty-five 96/100 Dollars for money on, to wit; the 27th day of June 1919 received by the defendant to the use of the plaintiff; which sums of money with the interest thereon is still unpaid.

Clarke Brown & Kohn
Wm. L. Anderson

Attorneys for plaintiff.

The account herein sued on is verified by the affidavit of a competent witness and is filed with this Complaint.

Clarke Brown & Kohn
Wm. L. Anderson

Attorneys for plaintiff.

ORIGINAL.

No.

State of Alabama,

BALDWIN COUNTY.

Circuit Court

Clarke, Davis & Co., partners,

vs.

Plaintiffs

J. B. Stuart

Defendants

SUMMONS AND COMPLAINT

Filed July 9th., 1919. 191

J. W. Riceman

Clerk

Defendant lives at

Bay Minette, Ala.

Clarke, Brown & Kohn and

Wm. S. Anderson,

Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette.

Received in office

7/9

1919

J. B. Stuart

Sheriff

I have executed this Writ

this

July 9

1919

by leaving a copy of the within summons and complaint with

J. B. Stuart

J. B. Stuart

Sheriff

Deputy Sheriff.

RECEIVED FOR RECORDED

Mr. J. B. Stuart

In account with Clarke, Davis & Co.

Sept	1918	3	To S/D to Baldwin County Bank	450.00		
"	"	"	" pd. fit on 1 B/c	1.50	451.50	1.195
"	"	4	" " " 2 "		2.90	08
"	"	5	" " " 2 "	2.89		
"	"	6	" S/D to Baldwin County Bank	300.00	302.89	7.88
"	"	9	" ck " him on a/c of cotton to be bought		775.00	19.98
"	"	11	" pd. fit. on 1 B/c		500.00	12.56
"	"	12	" " " 4 "		1.65	04
"	"	13	" S/D to Baldwin County Bank		7.87	19
"	"	16	" " " " " 900.00	2000.00		48.44
"	"	17	" pd. fit. on 9 B/c	2000.00	2900.00	68.31
"	"	18	" S/D to Baldwin County Bank	450.00	15.54	36
"	"	20	" pd. fit. on 26 B/c	43.65	493.65	11.42
"	"	24	" S/D to Baldwin County Bank		3.39	07
"	"	25	" ck to L. J. Richardson as per order	300.00	500.00	11.33
"	"	30	" pd. fit. on 2 B/c	3.36	300.00	6.53
"	"	30	" S/D to Baldwin County Bank	4.51	303.36	6.53
Oct	"	3	" S/D to Baldwin County Bank	350.00	354.51	7.24
"	"	4	" pd. fit on 1 B/c		200.00	3.96
"	"	8	" " " 6 "		1.60	03
Dec	"	31	" Difference in interest		8.98	17
					89.64	--
						9212.48

21707

Sept	1918	By	Credits		
"	12	"	1 B/c	168.80	4.13
"	16	"	fit. on 1 B/c	1.50	04
"	"	"	2 B/c	320.52	7.56
"	17	"	fit. on 2 B/c	2.90	07
"	"	"	1 B/c	157.89	3.64
Oct	1	"	fit. on 1 B/c	1.45	03
"	"	"	29 B/c	452.492	91.51
"	"	"	fit. on 29 B/c	49.22	99

Ford.

522720 10802

Oct	1918	By	<u>Ant Ford</u>	522720	10802
"	9	"	1 B/c	16675	308
"	"	"	fit on 1 B/c	144	03
"	14	"	1 B/c	16364	284
"	"	"	fit on 1 B/c	150	02
"	"	"	4 B/c	66459	1153
"	"	"	fit on 4 B/c	641	09
Dec	27	"	16 B/c	201756	180
"	"	"	fit on 16 B/c	2643	02
"	31	"	4 B/c	52255	--
"	"	"	fit on 4 B/c	699	--

59 B/c Recd
59 " Sold

12743

880506

Debits Forwarded

Balance due Clarke, Davis & Co. 12/31/19

921248

July 1919 To net proceeds 5 B/c mortgaged to Bank

40742

due Clarke Davis & Co.

68467

E.O.E.

and interest on items to date of settlement

\$ 109209

Interest on Balance 407.42 less interest charged
89.64 = 317.78 for 178 days 8% =

Interest on 684.67 from 7/1/19 to 6/27/19 = 140 days 8% =

1257
2130

3387

Total due C. D. & Co to 6/27/19.

112596

State of Alabama,)

Mobile County.)

Before me, M. K. Kishner

a notary

public in and for the State and County aforesaid,
personally appeared J. B. Davis, who is known to me, and who, being by me first
duly sworn, deposes and says that he is a member of the firm of Clarke, Davis &
Company, composed of affiant and Henry H. Clarke; that the foregoing is a true
and correct statement of the account of the said Clarke, Davis & Company against
J. B. Stuart; that the amount thereof, to-wit, the sum of eleven hundred and
twenty-five and 96/100 dollars, is justly due from the said J. B. Stuart to the
said Clarke, Davis & Company and is unpaid, and that there are no valid off-sets
or counterclaims to the said account, either at law or in equity.

J. B. Davis

Subscribed and sworn to before me,
this 7 day of July, 1919.

M. K. Kishner

NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

My Commission expires March 3, 1920

VERIFIED ACCOUNT.

Clarke, Davis & Co. partners

vs.

J. B. Stuart

Filed with Complaint, July 9th. 1910

J. B. Stuart
Clerk.