

167 90
626
1746

SEARS, ROEBUCK & COMPANY,
INC., a corporation,

Plaintiff,

vs.

TOMMY M. LANGHAM,

Defendant.

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

CASE NO. 7268

COUNT ONE

Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY SEVEN & 90/100 (\$167.90) DOLLARS due from them by account on, to-wit: May 2, 1966, which sum of money with the interest thereon is still unpaid.

COUNT TWO

Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY SEVEN & 90/100 (\$167.90) DOLLARS due from them by account stated on, to-wit: the 2nd day of May, 1966, which sum of money with the interest thereon is still unpaid.

COUNT THREE

Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY SEVEN & 90/100 (\$167.90) DOLLARS due for merchandise had and received by the defendants from the Plaintiff prior to the 2nd day of May, 1966, which sum of money with the interest thereon is still unpaid.

COUNT FOUR

Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY SEVEN & 90/100 (\$167.90) DOLLARS due from them by account, to-wit: the 2nd day of May, 1966, which sum of money with the interest thereon is still unpaid. This suit is filed on an itemized, verified statement of the account, which is attached hereto and made a part thereof.

PERLOFF & REID

BY: T. R. Reid
Attorney for Plaintiff

Defendant may be served at:

1000 Bradley Avenue
Bay Minette, Alabama

Emp: Accounting Department
International Paper Company
Bay Minette, Alabama

Invoice

SEARS, ROEBUCK AND CO.

Local Address 51 So. Royal St.
 City Mobile, State Ala.

Tommy M. Langham
 1000 Bradley Ave.
 Bay Minette, Ala.

Date 9/13/66

Your Order No. _____

Our Acct. No. EP

Terms: ~~Cash 10th of month after delivery~~ **NO DISCOUNT**

Kindly mention our account number when remitting or writing regarding this invoice

Quantity	DESCRIPTION	Unit Price	Total Price
	Balance		185.90
	Misc. Soft Line Mdse.		
	Less payment of \$18.00		
	BALANCE:		\$167.90
<p>Personally before me appeared D. B. Hinds, who after being duly sworn, deposes and states that he is Credit Manager for SEARS, ROEBUCK AND COMPANY, Mobile, Ala., that he is familiar with the accounts due said Company, that he has personal knowledge of the accounts described herein and that the foregoing balance is just, due and unpaid.</p> <p>SEARS, ROEBUCK AND COMPANY</p> <p>By <u>D. B. Hinds</u> Credit Manager</p> <p>Subscribed to and sworn to before me this <u>13th</u> day of <u>Sept.</u> 19<u>66</u>.</p> <p><u>Mary go Lee</u> NOTARY PUBLIC <u>Mobile</u> County, State of <u>Ala.</u> My commission expires <u>2/9, 1970</u></p>			

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7268

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Tommy Langham

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.....

Tommy Langham
....., Defendant.....

by Sears, Roebuck & Company

....., Plaintiff.....

Witness my hand this 16 day of November 19 66

Miss J. J. J. Clerk

*Specified
Nov. 16, 1966
Raymond H. Hines*
W. P. Holbert Jr.

No.....7268.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

SEARS, ROEBUCK & COMPANY

Plaintiffs

vs.

TOMMY LANGHAM

Defendants

SUMMONS AND COMPLAINT

Filed 11-16 19..66..

..... Alice J. Duck Clerk

Perloff & Reid

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19.....

Sheriff

I have executed this summons

this Nov 16 19..66..

by leaving a copy with

Tommy Langham

Decker Welby Sheriff

W. A. Zeller Deputy Sheriff

om.

AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT

CC LAW 12-2M-12/65

THE STATE OF ALABAMA }
MOBILE COUNTY

CIRCUIT COURT

the undersigned authority
Personally appeared before me, ~~John F. Mandeville, Clerk of the Circuit Court~~ in and for Mobile County
and State aforesaid T. Dwight Reid
who being duly sworn, on oath says, that on the 6th day of January, 19 67
in the Circuit Court of Mobile County, in Case No. 7268 The Plaintiff
Sears, Roebuck & Company, a corporation,
recovered a judgment against Tommy M. Langham
the Defendant, whose address
is 1000 Bradley Avenue, Bay Minette, Alabama
for the sum of \$150.90
Dollars, besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect;
that International Container Factory
Bay Minette, Alabama
whose address is Bay Minette, Alabama
is supposed to be indebted to or have effects of the said
Tommy M. Langham
in its possession or under its
control, and that he believes process of Garnishment against the said
International Container Factory
is necessary to obtain satisfaction of said Judgment.

Sworn to and subscribed this 24th
day of May A.D., 19 67

Rose Marie Lang
Clerk

FILED
MAY 26 1967

No.....

CIRCUIT COURT

VS.

**AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT**

Filed in Office,

5-26-1967

Oliver J. Leach
Clerk.