JOHN P. BEEBE Attorney at Law Robertsdale, Alabama

March 7, 1967

Mrs. Alice J. Duck, Clerk, Circuit Court, Baldwin County, Bay Minette, Alabama.

Dear Mrs. Duck:

I enclose summon and complaint, in duplicate, in the matter of Brown Manufacturing Corporation vs. Jack Vaughn, with the request that the suit be filed and placed in the hands of the Sheriff for service on the Defendant, who lives at Route 1, Box 226, Robertsdale, Alanama.

Thanks, I am

Yours very truly

STATE OF ALABAMA ) ) TO ANY SHERIFF OF THE STATE OF ALABAMA: ) BALDWIN COUNTY )

You are hereby commanded to summon Jack Vaughn, 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 Brown Manufacturing Corporation.

Witness my hand, this the \_\_\_\_\_ day of March, 1967.

lice ( Unch Clerk

AT LAW

BROWN MANUFACTURING CORPORATION, a corporation,

Plaintiff,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

Nc.

VS

8 1967

NYK CLERK REGISTER

MAR

24-10-21-6

JACK VAUGHN,

Defendant.

## COUNT ONE

The Plaintiff claims of the Defendant the sum of TWO HUNDRED TWENTY & 86/100 (\$220.86) DOLLARS, due from him by account on the 20th day of October, 1966, with the interest thereon, is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant the sum of TWO HUNDRED TWENTY & 86/100 (\$220.86) DOLLARS, for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: the 21st, day of January, 1966, with the interest thereon, is still unpaid.

## COUNT THREE

The Plaintiff claims of the Defendant the sum of TWO HUNDRED TWENTY & 86/100 (\$220.86) DOLLARS, for work and labor done for the Defendant by the Plaintiff on, to-wit: the 21st, day of January, 1966, at his request, with the interest thereon, is still unpaid.

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Actorney for Plaintiff

Frown Monupocturing Cy "papts Address! REIL BOTIFIC 67 3 march 67 Received\_ day of. and on 21 day of Oct 192 I served a copy of the within of 1-C. 15 Josek Voujahn By service on. TANCOR WILKINS, Sheriff By Carlist. Chicaus, S. Roturnal Not freeze in my ousny and search and s Daylor Spitting Qu' " Sheriff Deputy Sheriff Stain claim 50 Pont Contes por mile Totoph 5 MAR 8 1967 OC MUE L WIN, RECISION John P. Brebe Atty