

RUTH E. LAMBERT and DOROTHY B.)
LAMBERT, individually and doing)
business as LAMBERT's DRUG)
STORE,) IN THE CIRCUIT COURT OF
Plaintiff,)
vs.) BALDWIN COUNTY, ALABAMA
HARRY BOESCHEN,)
Defendant.)
LAW SIDE.
7432

COUNT ONE:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SEVENTY FOUR AND 62/100 DOLLARS (\$174.62), together with the interest thereon, due by account by and between the Plaintiff and the Defendant, on, to-wit, the 30th day of September, 1966, which sum of money, together with the interest thereon, is still due and unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SEVENTY FOUR AND 62/100 DOLLARS (\$174.62), together with the interest thereon, due by account stated by and between the Plaintiff and Defendant, on, to-wit, the 30th day of September, 1966, which sum of money, together with the interest thereon, is still due and unpaid.

COUNT THREE:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SEVENTY FOUR AND 62/100 DOLLARS (\$174.62), together with the interest thereon, for goods, merchandise and chattels sold by the Plaintiff to the Defendant, on the 30th day of September, 1966, and various dates prior thereto, which sum of money with the interest thereon, is still due and unpaid.

OWENS AND PATTON

By: Walter S. Patton
Attorneys for Plaintiff.

FILED

631

MAR 31 1967
MEL DICK CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.....

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

HARRY BOESCHEN

BRADY ROAD

BAY MINETTE, ALABAMA

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.....

HARRY BOESCHEN

Defendant.....

by RUTH E. LAMBERT and DOROTHY B. LAMBERT, individually and doing
business as Lambert's Drug Store

Plaintiff.....

Witness my hand this..... 31st..... day of.... March..... 19 67....

Ollie J. Clark Clerk

692

executed
4-16-67

No. 77493

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Ruth L. Chamberlain &
Dorothy B. Chamberlain
and wife Plaintiffs
vs.
Harry Boeschen Defendants

SUMMONS AND COMPLAINT

Filed 3-31 1967
Alice Duck Clerk

Walter S. Potts Plaintiff's Attorney
Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office
MAR 31 1967

TAYLOR WILKINS
SHERIFF Sheriff

I have executed this summons
this April 10 1967
by leaving a copy with

Harry Boeschen

Taylor Wilkins Sheriff
R. O. Zell Deputys Sheriff