

ORIGINAL

PEARSON BROS. SUPPLY)
COMPANY, INC.,)
Plaintiff,)
VS:) AT LAW
LOUISE McLAIN,)
Defendant)
CASE NO. 8508

BILL OF COMPLAINT

I

The Plaintiff claims of the Defendant ONE THIRTY NINE AND 11/100 DOLLARS (\$139.11), due from her on account, to-wit: the 17th day of June, 1967, which sum of money with the interest thereon, is still unpaid.

II

The Plaintiff claims of the Defendant ONE THIRTY NINE AND 11/100 DOLLARS (\$139.11), due from her for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit: the 17th day of June, 1967, which sum of money with the interest thereon is still unpaid.


RICHARD C. LACEY
ATTORNEY FOR PLAINTIFF

There is attached hereto as Exhibit "A" and made a part hereof, an itemized statement of account verified by Percy Pearson, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 17th day of June, 1967, and due at present.

Defendant resides at
Seminole, Alabama

FILED

JAN 13 1968

AMC 1 13 1968
JAN 13 1968

STATEMENT

Pearson Bros. Supply Company, Inc.

P. O. BOX 144

ROBERTSDALE, ALABAMA

Phone 947-5235

Louise McLain
Seminole, Ala.

DATE	INVOICE NO	CHARGES	CREDITS	BALANCE
			BAL. FORWARDED	25.54
5-13-67	4107	254		254
5-13-67	4108		10.00	
5-16-67	4129	697		49
5-17-67	4145	6292		63.41
5-22-67	4189		500	58.41
5-22-67	4302	83		59.24
5-22-67	4303	860		67.84
5-22-67	4339	6532		133.16
5-24-67	4370	mdc Ret	8.25	124.91
6-12-67	4753	14.23		139.11

Pay Last Amount in This Column

A F F A D A V I T

STATE OF ALBAMA

BALDWIN COUNTY

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared PERCY PEARSON, who after being first duly sworn, doth depose and say as follows: My name is PERCY PEARSON. I am the Manager-Owner of Pearson Bros. Supply Company, Inc.; Louise McLain purchased materials and supplies over a period of time from Pearson Bros. Supply Company, Inc. and has an unpaid balance due Pearson Bros. Supply Company, Inc. in the amount of ONE HUNDRED THIRTY NINE and 11/100 Dollars (\$139.11); that there are no said off sets, counter claims or amounts owing Louise McLain by Pearson Bros. Supply Company, Inc.; that attached hereto and made a part hereof is a statement of account showing the dates of purchases and credits on behalf of Louise McLain which said statement is true and correct.

DATED THIS the 3 day of January, 1969

PEARSON BROS. SUPPLY COMPANY,
INC.

BY Percy Pearson
PERCY PEARSON

SWORN TO AND SUBSCRIBED

before me on this the

3rd day of January
1969.

Notary I. Kame
NOTARY PUBLIC

FILED

JAN 13 1969

Miss E. L. L. L. CLERK
REGISTER

480

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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 SummonLouise McLain.....

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.....

.....Louise McLain....., Defendant.....

byPearson Bros. Supply Co., Inc......

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

Witness my hand this.....13..... day of.....Jan..... 1969.....

.....Chas. J. Duck..... Clerk

24/1/13/69

481

RICHARD C. LACEY

TELEPHONE 928-2373

ATTORNEY AT LAW

FAIRHOPE, ALABAMA 36532

January 8, 1969

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

RE: Pearson Bros. Spl. Co., Inc. vs. Gladys Vaughn
Pearson Bros. Spl. Co., Inc. vs. Louise McLain
Pearson Bros. Spl. Co., Inc. vs. Robert Pardue

8510
8508
8509

Dear Mrs. Duck:

Enclosed please find summons and complaints in subject cases and place before the sheriff for service. Thank you.

Sincerely,

Richard C. Lacey
RICHARD C. LACEY

dt

RCL/dt

STATEMENT

Pearson Bros. Supply Company, Inc.

P. O. BOX 588

ROBERTSDALE, ALABAMA

Phone 947-5235

Louise McLain
Seminole, Ala.

DATE	INVOICE NO.	CHARGES	CREDITS	BALANCE
			BAL. FORWARDED	254
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Pay Last Amount in This Column 