

KLUMPP MOTOR CO., INC., )  
                    ) IN THE CIRCUIT COURT OF  
                Plaintiff, )  
  
VS: ) BALDWIN COUNTY, ALABAMA  
  
                    ) AT LAW  
GEORGE WIGGINS, )  
                    ) CASE NO. \_\_\_\_\_  
                Defendant )

# BILL OF COMPLAINT

I

The plaintiff claims of the Defendant ONE HUNDRED THIRTY THREE AND 63/100 DOLLARS (\$133.63), due from on account, to-wit: the 13th day of April, 1968, which sum of money is still unpaid.

II

The plaintiff claims of the defendant ONE HUNDRED THIRTY THREE AND 63/100 DOLLARS (\$133.63), due from him on account for merchandise, goods and chattels sold by the plaintiff to the defendant on to-wit: the 13th day of April, 1968, which sum of money is still unpaid.

RICHARD C. LACEY  
Attorney for plaintiff

Defendant resides at  
~~Silverhill Hwy.~~  
Silverhill, Alabama

**FILED**

MAR 5 1969

ALICE J. DUCK CLERK  
REGISTER

VOL 61 PAGE 701

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 ....George wiggins.....

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.....

.....George wiggins....., Defendant.....

by .....Klumpp Motor Co., Inc.....

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

Witness my hand this.....5.....day of.....Mar.....1969

.....Clerk

243-19-69

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

..... Klumpp Motor Co., Inc. ....  
Plaintiffs

vs.

..... George Wiggins .....  
Defendants

SUMMONS AND COMPLAINT

**FILED**

Filed ..... 19.....

MAR 5 1969

Clerk

**ALICE J. DUCK**

CLERK  
REGISTER

*R. Lacey*

Plaintiff's Attorney

Defendant's Attorney

*Hale,*

Defendant lives at

*Line next to Willey's  
Store on Buford Rd.*

Received In Office

*March 5* 19*69*  
*Taylor Wilkins* Sheriff

I have executed this summons

this *March 19* 19*69*

by leaving a copy with

*George Wiggins*

*F. Luper*

Sheriff claims *20* miles at

Ten Cents per mile Total \$ *2.00*

*TAYLOR WILKINS* Sheriff

BY *Randall*  
DEPUTY SHERIFF

*Taylor Wilkins* Sheriff  
*Roy Randall* Deputy Sheriff

P. O. DRAWER A-J

**RICHARD C. LACEY**

TELEPHONE 923-2373

ATTORNEY AT LAW

FAIRHOPE, ALABAMA 36532

March 3, 1969

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

*W. 8592*

RE: Klumpp Motor Co., Inc.  
vs. George Wiggins

Dear Mrs. Duck:

please find enclosed summons and complaint and file for  
service. Thank you.

sincerely,

*Richard C. Lacey*  
RICHARD C. LACEY

RCL/dt