

SUMMONS

STATE OF ALABAMA,)

COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons CHARLES SPANN, d/b/a SPANN FURNITURE & APPLIANCE COMPANY, 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, Alabama, at the place of holding same by ISELIN-JEFFERSON FINANCIAL CO., INC.

Witness my hand this the 5th day of March, 1969.

W. J. J. J. J.
Clerk

** ** *

COMPLAINT

ISELIN-JEFFERSON FINANCIAL	X	
CO., INC., a Delaware Corp.,	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:	X	AT LAW
CHARLES SPANN, d/b/a SPANN	X	
FURNITURE & APPLIANCE COMPANY,	X	
DEFENDANT.	X	

COUNT I:

The Plaintiff claims of the Defendant TWO THOUSAND FIVE HUNDRED FORTY-NINE & 36/100 DOLLARS (\$2,549.36), due from him by account on, to wit: 28th day of June, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant TWO THOUSAND FIVE HUNDRED FORTY-NINE & 36/100 DOLLARS (\$2,549.36), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 28th day of June, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant TWO THOUSAND FIVE HUNDRED FORTY-NINE & 36/100 DOLLARS (\$2,549.36), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 28th day of June, 1968, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 20th day of February, 1969.

Forest A. Christian, Attorney
for the Plaintiff

Defendant's address:

Box 236
Robertsdale, Alabama 36567
or
707 North Milwaukee Street
Robertsdale, Alabama 36567

FILED

MAR 5 1969

AFFIDAVIT

STATE OF NEW YORK)
COUNTY OF NEW YORK)

Before me, the undersigned authority in and for aforesaid County and State, who is a Notary Public under my seal of office, which seal of office is hereto attached, personally appeared Howard R. Patten, known to me, who being duly sworn upon his oath stated that he is the Vice President of ISELIN JEFFERSON FINANCIAL COMPANY, INC., organized and doing business under the laws of the State of Delaware, that as such he makes this affidavit, that he is familiar with the books and business of ISELIN JEFFERSON FINANCIAL COMPANY, INC., that the attached account against SPANN FURNITURE & APPLIANCE CO. is just and correct, within the knowledge of the affidavit, that he has authority to make this affidavit and that he has personal knowledge of the matters contained herein, that the items thereon stated composing the said account, were sold and delivered to the above mentioned debtor at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which said debtor is entitled as thereon stated, and that the balance thereof, amounting to the sum of \$ 2,549.36 with interest from _____, is justly due and remains unpaid.

Howard R. Patten
Affiant

Sworn to, subscribed, acknowledged, signed and sealed before me as a Notary Public under my seal of office, my seal hereto affixed on this the 20th day of February, 1969.

Affix Seal:

Roseann Favara
Notary Public

My Commission Expires _____

FILED

MAR 5 1969.

ROSEANN FAVARA
Notary Public, State of New York
No. 24-6246150 Qual. in Kings County
Certificate filed in New York County
Commission Expires March 30, 1970

ALICE J. DUCK CLERK
REGISTER

VOL 61 PAGE 704

24-4-7-69

Received 5 day of March 1969
and on 7 day of April 1969

I served a copy of the within W.F.C.

on Charles Spann

By service on _____

By service on _____

TAYLOR WILKINS, Sheriff

By H. L. Brown D. S.

50 miles R.T.
R' scale, Ala

Sheriff claims 50 miles at
\$15.00

Don Counts per mile Total \$
TAYLOR WILKINS, Sheriff

BY Brown
DEPUTY SHERIFF

708593

SUMMONS AND COMPLAINT

ISELIN-JEFFERSON FINANCIAL CO.,
INC., a Delaware Corp.,

PLAINTIFF,

VS:

CHARLES SPANN, d/b/a SPANN
FURNITURE & APPLIANCE COMPANY,

DEFENDANT.

FILED

MAR 5 1969

ALICE J. DICKSON
CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
(205) 943-2201
P. O. DRAWER 190
FOLEY, ALABAMA 36535

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 120

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

May 13, 1969

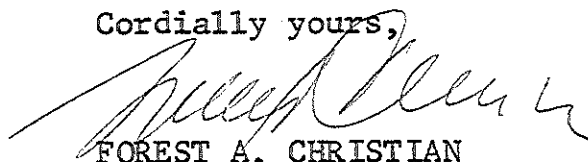
Honorable Telfair Mashburn
Judge of Circuit Court
Bay Minette, Alabama 36507

Re: Iselin-Jefferson Financial
Co., Inc., a Delaware Corp.
Vs: Charles Spann, d/b/a Spann
Furniture & Appliance Company
Case No. 8593

Dear Judge Mashburn:

Kindly render a judgment in this case based on
an itemized statement of account which was been sworn
to, in amount of \$2,549.36, plus \$140.00 Interest,
for a total of \$2,689.36.

Cordially yours,



FOREST A. CHRISTIAN