

MOORE-HANDLEY HARDWARE  
COMPANY, INC., a corporation,

Plaintiff,

-vs-

W. S. ALEXANDER, individually  
and doing business as ALEXANDER  
PLUMBING AND HEATING COMPANY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1574

COUNT ONE

Plaintiff claims of the Defendant THREE HUNDRED SIXTY-SIX AND 09/100 (\$366.09) DOLLARS, due from him by account between the Defendant and Moore-Handley Hardware Company, Inc., a corporation, on the 16th day of October, 1950 which sum of money, with the interest thereon, is still unpaid.

COUNT TWO

Plaintiff claims of the Defendant THREE HUNDRED SIXTY-SIX AND 09/100 (\$366.09) DOLLARS, on account stated between the Defendant and Moore-Handley Hardware Company, Inc., a corporation, on the 16th day of October, 1950 which sum of money, with the interest thereon, is still unpaid.

COUNT THREE

Plaintiff claims of the Defendant THREE HUNDRED SIXTY-SIX AND 09/100 (\$366.09) DOLLARS, for merchandise, goods and chattels sold by Moore-Handley Hardware Company, Inc., a corporation, to the Defendant during the period June 15, 1950 to June 22, 1950, inclusive, which sum of money with the interest thereon is still unpaid.

~~WALTER M. COOK~~  
WALTER M. COOK, ATTORNEY FOR PLAINTIFF

An itemized verified statement of account sued on in COUNTS ONE AND TWO is hereto attached and made a part hereof.

~~WALTER M. COOK~~  
WALTER M. COOK, ATTORNEY FOR PLAINTIFF

Defendant may be served:

Bay Minette  
Alabama

STATEMENT  
MOBILE DIVISION  
MOORE-HANDLEY HARDWARE CO., Inc.

Mobile 16, Alabama

- ALEXANDER PLUMBING COMPANY
- BAY MINETTE, ALABAMA

INTEREST CHARGED ON ALL BILLS AFTER MATURITY.  
WHEN REMITTING PLEASE LIST INVOICES BEING PAID.

DATE	REFERENCE	CHARGES	CREDITS	BALANCE
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PREVIOUS MONTHS' BALANCE

JUN 16 NT	113.72	113.72		
JUN 19 NT	60.27	173.99		
JUN 21 NT	192.10	366.09		

STATE OF ALABAMA)  
JEFFERSON COUNTY)

Before me, Carrie B. Hayes, Notary Public in and for said County, and for said State, personally appeared Otto Schoel, Assistant Secretary-Treasurer of MOORE-HANDLEY HARDWARE COMPANY, Incorporated who states upon oath that the above account is correct, and that to the knowledge of the deponent there are no just offsets or counter claims to the same.

Sworn to and subscribed to before me this the 16th day of October, 1950.

Carrie B. Hayes  
Notary Public.

SUMMONS AND COMPLAINT

Moore Printing Co.

THE 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 \_\_\_\_\_  
W. S. Alexander

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 \_\_\_\_\_

W. S. Alexander

\_\_\_\_\_, Defendant  
by \_\_\_\_\_  
Moore-Handley Hardware Co. Inc,  
A Corp

\_\_\_\_\_, Plaintiff

21st  
Witness my hand this \_\_\_\_\_ day of \_\_\_\_\_

October 19 50

\_\_\_\_\_  
Clerk

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

MOORE-HANDLEY HARDWARE CO.

INC. A Corp

Plaintiffs

vs.

W. S. ALEXANDER, individually and

d/b/a ALEXANDER PLUMBING AND

HEATING CO Defendants

SUMMONS and COMPLAINT

Filed 10-21, 19 50

*Christine*, Clerk

Defendant lives at

RECEIVED IN OFFICE

Oct. 21, 19 50

*Walter A. Alexander* Sheriff

I have executed this summons

this 12th 23, 19 50

by leaving a copy with

*W. S. Alexander*

Plaintiff's Attorney

Defendant's Attorney

Sheriff

Deputy Sheriff