

1579

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

-vs-

VERNON MCDAVID, individually  
and doing business as NORTH-  
SIDE AUTO SERVICE,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

NO. \_\_\_\_\_

COUNT ONE

Plaintiff claims of the Defendant SIXTY-NINE AND 56/100  
(\$69.56) DOLLARS, due from him by account between the Defendant  
and Moore-Handley Hardware Company, Inc., a corporation, on the  
28th day of April, 1949 which sum of money, with the interest  
thereon, is still unpaid.

COUNT TWO

Plaintiff claims of the Defendant SIXTY-NINE AND 56/100  
(\$69.56) DOLLARS, on account stated between the Defendant and  
Moore-Handley Hardware Company, Inc., a corporation, on the  
28th day of April, 1949 which sum of money, with the interest  
thereon, is still unpaid.

COUNT THREE

Plaintiff claims of the Defendant SIXTY-NINE AND 56/100  
(\$69.56) DOLLARS, for merchandise, goods and chattels sold by  
Moore-Handley Hardware Company, Inc., a corporation, to the  
Defendant on the 28th day of April, 1949 which sum of money  
with the interest thereon is still unpaid.

  
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, ATTORNEY FOR PLAINTIFF

Defendant may be served:  
Foley, Alabama

## STATEMENT

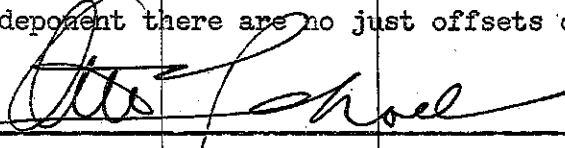
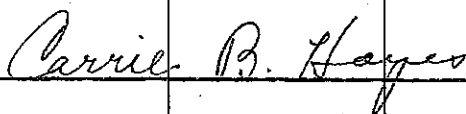
## MOORE-HANDLEY HARDWARE CO., Inc.

Birmingham 2, Alabama Oct. 25, 1950.

NORTHSIDE AUTO SERVICE,  
FOLEY, ALABAMA.

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

1949

DATE	REFERENCE	CHARGES	CREDITS	BALANCE
PREVIOUS MONTHS' BALANCE				
April 28, 1949 - Mdse -		\$ 69.56		69.56
STATE OF ALABAMA)				
JEFFERSON COUNTY)				
Before me, <u>Carrie B. Hayes</u> , a Notary Public in and for said County				
in said State, personally appeared <u>Otto Schoel</u> , Assistant				
Secretary-Treasurer, of <u>MOORE-HANDLEY HARDWARE COMPANY</u> , 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 before me this the 25th day of October, 1950.				
				

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 \_\_\_\_\_

Vernon McDavid, Individually and d/b/a Northside Auto Service

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 \_\_\_\_\_

Vernon McDavid, Individually and d/b/a Northside Auto Service, Defendant.---

by Moore- Handley Hardware Company, a corp

\_\_\_\_\_, Plaintiff.---

Witness my hand this 13th day of Nov 19 50

Archie J. [Signature], Clerk

RECORDED

No. 1579

Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

Moore-Handley  
Hardware Co, Inc  
Plaintiffs

vs.

Vernon McDavid  
ind. & d/b/a Northside Auto Service  
Defendants

SUMMONS and COMPLAINT

Filed 11-13, 1950

W. J. Welch, Clerk

1579

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Nov. 13, 1950

Taylor B. Smith, Sheriff

I have executed this summons

this 21 Nov, 1950  
by leaving a copy with

Vernon McDavid

Taylor B. Smith, Sheriff

Deputy Sheriff