

336

MRS. WILLIE B. GREEN, doing
business as GREEN'S CASH
GROCERY,

Plaintiff,

VS.

RANDOLPH MCCOWAN,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

Now comes the Defendant and for answer to the Plaintiff's
complaint and to each count thereof, separately and severally, says:

FIRST:

That the facts therein alleged are untrue.

Dee Dee Hall & A
Attorneys for Defendant.

336

RECORDED
Duck
8-19

ANSWER:

MRS. WILLIE B. GREEN, doing
business as GREEN'S CASH
GROCERY,

Plaintiff,

VS.

RANDOLPH MCGOWAN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

Filed Feb. 11, 1937
R. S. Duck
clerk

SUMMONS

STATE OF ALABAMA :
BALDWIN COUNTY : IN THE CIRCUIT COURT, SPRING TERM, 1937.

To Any Sheriff of the State of Alabama, Greeting:-

You are hereby commanded to summon RANDOLPH McGOWAN, of Bay Minette, Alabama, to appear within thirty days from the service of this writ, in the Circuit Court of Baldwin County, Alabama, at the place of holding the same, then and there to answer the Complaint of Mrs. WILLIE B. GREEN, Doing Business as GREEN'S CASH GROCERY.

Witness my hand, this 19 day of January, 1937.

R. S. Duck
Clerk of the Circuit Court.

COMPLAINT

Mrs. WILLIE B. GREEN, Doing Business as GREEN'S CASH GROCERY,	:	At Law, No. <u>336</u>
	:	IN THE CIRCUIT COURT
Plaintiff,	:	OF BALDWIN COUNTY, ALABAMA,
vs.	:	SPRING TERM, 1937.
RANDOLPH McGOWAN,	:	
Defendant.	:	

Count One

The Plaintiff claims of the Defendant the sum of One Hundred Seventeen and 06/100 Dollars (\$117.06) due from him by account on, to-wit: the 4th day of October, 1935, which sum of money, with interest thereon, is still due and unpaid; and the Plaintiff further alleges that a verified statement of said account is hereunto attached and made a part of this Complaint and that the same will be used as evidence against the Defendant.

Count Two

The Plaintiff claims of the Defendant the sum of One Hundred Seventeen and 06/100 Dollars (\$117.06) due from him by Account Stated between the Plaintiff and the Defendant on, to-wit: the 4th day of October, 1935, which sum of money, with interest thereon, is still due and unpaid; and the Plaintiff further alleges that a verified statement of said account is hereunto attached and made a part of this Complaint and that the same will be used as evidence against the Defendant.

Count Three

The Plaintiff claims of the Defendant the sum of One Hundred Seventeen and 06/100 Dollars (\$117.06) due from him ~~by~~ for merchandise, goods, and chattels sold by the Plaintiff to the Defendant, on, to-wit: the 4th day of October, 1935, which sum of money, with interest thereon, is still due and unpaid.

Leslie Hall
LESLIE HALL, Attorney for the Plaintiff.

MRS. WILLIE B. GREEN,
Doing Business as GREEN'S
CASH GROCERY,
Plaintiff,

vs.

RANDOLPH McGOWAN,
Defendant.

SUMMONS AND COMPLAINT
ON
ACCOUNT

CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

Filed in Office this 19
day of January, 1937.

R. E. Duck
Clerk.

LESLIE HALL
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

Executed 1-20 1937
by serving copy of within Summons and
Complaint on
Randolph McGowan

M. H. Wilbers Sheriff
C. N. Ardern Deputy Sheriff

336

CIRCUIT COURT

Sept. _____ Term, 194_2_

You are hereby commanded, That of the goods and chattels, lands and tenements of ~~rs Willie B Green Doing Business as Greens Cash Grocery~~ Plaintiff in the suit, you cause to be made the sum of 12 30. Dollars, costs of suit, created by said Plaintiff, for that, whereas, on the 28th day of Sept. 1942, the said Plaintiff ~~Recovered by the judgment of the said Circuit Court of said County, against~~ Case Dismissed: Randolph McGowan.

to the suit, the sum of XX X X X XX X X XXXXXX Dollars,
besides Twelve and 30/100 Dollars, costs of suit;
upon which Judgment and Execution has been issued and returned by the Sheriff. No property found

AND HAVE YOU THAT MONEY ready to render to R S Duck.
Clerk of said Court, and make return with this Writ and the Execution thereof, according to law.

Witness my hand this 23. day of Dec. 194- 2

Dec. 194 2
R. S. Luck Clerk

[illegible]

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

Mrs Willie B Green Doing

business as Greens Cash Grocery,
Plaintiff...

vs.

Randolph McGowan.

Defendant...

Civil Execution for Costs
Against Plaintiff

Costs - - - - - \$ 12 30,...

Civil Fee Book of ds. Page

Execution Docket Page

Filed Dec. 23, 1942.

Randolph McGowan Clerk.

Leslie Hall,
Plaintiff's Attorney

Defendant's Attorney

Received in Sheriff's Office
this 23 day of Dec, 1942
W. R. STUART, Sheriff

COLLECTION COSTS FROM

The State of Alabama, }
BALDWIN COUNTY

I hereby certify that the within.....
and costs in this case are correct, and there
was waiver of exemption as to personal
property under the Constitution and Laws of
Alabama.

This day of 194

..... Clerk.

Received in office

..... 194

..... Sheriff

Sheriff's Execution Docket, Page

Sheriff's Fee Book, Page

*Returned 3/23/43 to
property of the plaintiff
found
W.R. Stuart, Sheriff
By [Signature]*

Sheriff

THE STATE OF ALABAMA,
Baldwin County.

By virtue of the within execution, I have at

o'clock, M., this day of 194 levied

May	28	to May 3 Bullfinch		34 28
May	3	Credit Check	20 00	
June	1	May Acct		30 76
July	1	June Acct		27 29
July	16	Credit Check	30 00	
July	1	July Acct		30 09
Sept	1	August Acct		33 37
Sept	7	Credit Check	75 00	
Oct	4	Sept + Oct acct		34 21
			75 00	192 06

Baldwins

11 7 01

BAY MINETTE, ALA

193

OF ACCOUNT

M

Jan 13 7
Randolph M. Green
City

IN ACCOUNT WITH

GREEN'S CASH GROCERY

GROCERIES, MEATS AND VEGETABLES

Phone 57-j

Credit

1935

<i>March 18</i>	<i>Bal to date</i>			<i>2 06</i>
<i>" 28</i>	<i>to May 3</i>	<i>Baldwins</i>		<i>34 28</i>
<i>May 3</i>	<i>Credit check</i>	<i>20 00</i>		
<i>June 1</i>	<i>May Acct</i>			<i>30 76</i>
<i>July 1</i>	<i>June Acct</i>			<i>27 29</i>
<i>July 16</i>	<i>Credit check</i>	<i>30 00</i>		
<i>Aug 1</i>	<i>July Acct</i>			<i>30 09</i>
<i>Sept 1</i>	<i>August Acct</i>			<i>33 37</i>
<i>Sept 7</i>	<i>Credit check</i>	<i>75 00</i>		
<i>Oct 4</i>	<i>Sept + Oct acct</i>			<i>34 21</i>
		<i>75 00</i>		<i>192 06</i>

*Baldwins**117 01*

ary Public in and for
 appeared J. Manning Green,
 and says, that he is the
 ocery, of Bay Minette,
 unt of said firm against
 ma, which is hereunto
 and that there is now due
 Seventeen and 06/100
 credits, set-offs, or

*J. Manning Green*19th day of January, 1937.

W. O. Vail
 Baldwin County, Alabama.

AFFIDAVIT OF CORRECTNESS OF ACCOUNT

STATE OF ALABAMA §
 §
BALDWIN COUNTY §

Before me, Leslie Hall, a Notary Public in and for said County in said State, personally appeared J. Manning Green, who, being by me duly sworn, deposes and says, that he is the Manager for the firm of Green's Cash Grocery, of Bay Minette, Alabama; that the statement of the account of said firm against Randolph McGowan, of Bay Minette, Alabama, which is hereunto annexed, is just, true, and correct; and that there is now due on said account the sum of One Hundred Seventeen and 06/100 Dollars (\$117.06) ^{and interest,} after deducting all credits, set-offs, or counter-claims.

J. Manning Green

Sworn to and subscribed before me this 17th day of January, 1937.

Leslie Hall
Notary Public, Baldwin County, Alabama.

AFFIDAVIT OF CORRECTNESS OF ACCOUNT

STATE OF ALABAMA §
 :
BALDWIN COUNTY §

Before me, Leslie Hall, a Notary Public in and for said County in said State, personally appeared J. Manning Green, who, being by me duly sworn, deposes and says, that he is the Manager for the firm of Green's Cash Grocery, of Bay Minette, Alabama; that the statement of the account of said firm against Randolph McGowan, of Bay Minette, Alabama, which is hereunto annexed, is just, true, and correct; and that there is now due on said account the sum of One Hundred Seventeen and 06/100 Dollars (\$117.06) ^{and interest,} after deducting all credits, set-offs, or counter-claims.

J. Manning Green

Sworn to and subscribed before me this 12th day of January, 1937.

Leslie Hall
Notary Public, Baldwin County, Alabama.