

1027

STATEMENT

J. H. SHIBLEY

IN ACCOUNT WITH

H. L. GOODWIN

SALARY DUE 1946

From April 11, to and including August 26th
@ \$30.00 per week. \$584.00

STATE OF ALABAMA

COUNTY OF MOBILE

Before me, the undersigned authority in and for
said State and County, personally appeared H. L. Goodwin
who being by me first duly sworn deposes and says that the
above statement of his account against J. H. Shibley of
Baldwin County in the State of Alabama is just, true and
correct; that there is now due on said account the sum of
\$584.00 after deducting all credits, setoffs or counterclaims.

H. L. Goodwin
H. L. Goodwin

Sworn to and subscribed before me
this 3rd day of January, 1947.

Marcella M. Cowan
Notary Public, Mobile County, Alabama

MRS. H. L. GOODWIN
PLAINTIFF
VS
J. H. SHIBLEY
DEFENDANT

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

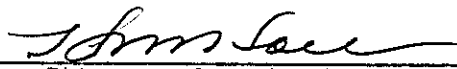
Now comes the Defendant and for answer to the Plaintiff's complaint
and each count thereof separately and severally says:

1.

The facts are untrue.

2.

The Plaintiff ought not to recover of the Defendant because at the
time the suit was filed the Plaintiff was indebted to the Defendant in the
sum of SIX HUNDRED (\$600.00) DOLLARS, by account on, to-wit, September 1,
1946, which the Defendant offers to off set against the claim of the
Plaintiff and claims judgment for the excess.


Attorney for the Defendant

1024

MRS. H. L. GOODWIN

PLAINTIFF

VS

J. H. SHIBLEY

DEFENDANT

ANSWER

FILED
MAR 3 1947
ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY

No. _____

TERM, 194____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. H. SHIBLEY

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_____

J. H. SHIBLEY

_____, Defendant_____

by MRS. H. L. GOODWIN

_____, Plaintiff_____

Witness my hand this 10th day of Feb 1947

Alice J. Luck Clerk.

No. 1027

Page

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

MRS. H. L. GOODWIN

Plaintiffs

vs.

J. H. SHIBLEY

Defendants

SUMMONS AND COMPLAINT

Filed 2-10-1947

Clerk

RICKARBY & RICKARBY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

194

Sheriff

I have executed this summons

this 194

by leaving a copy with

Sheriff

Deputy Sheriff

MRS. E. L. GOODWIN,
Plaintiff

vs.

J. H. SHIBLEY,
Defendant

IN THE CIRCUIT COURT

OF

BALDWIN COUNTY, ALABAMA

AT LAW.

COMPLAINT

COUNT 1.

The Plaintiff claims of the Defendant three hundred and eighty-eight dollars (\$388.00), due from him by account on, to wit, the 26th day of August, 1946, which sum of money together with interest thereof is still unpaid.

COUNT 2.

The Plaintiff further claims of the Defendant three hundred and eighty-eight dollars (388.00) due from him for work and labor done by the Plaintiff for the Defendant ~~from, to wit, the 11th day of April, 1946, to the 26th day of~~ August, 1946, at his request, which sum of money, together with the interest thereon, is still unpaid.


ATTORNEYS FOR PLAINTIFF

The account sued on is evidenced by an itemized and verified statement filed herewith.


ATTORNEYS FOR PLAINTIFF

1027
Magnolia Spgs

MRS. H. L. GOODWIN
Plaintiff

vs.

J. H. SHIBLEY
Defendant

COMPLAINT

RICKARBY & RICKARBY
ATTORNEYS FOR PLAINTIFF

Received in Office

Feb 11, 1847

Taylor Wilkins
Sheriff

Executed by serving
copy of the within
summons & complaint on
J. H. Shibley, Feb. 18 1847

Taylor Wilkins Sheriff
H. F. Hall Deputy S. Sheriff

1027

Filed

2-10-47

Recd. Clerk
clerk

R