

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT IN
LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Baker Engineering, Inc., a corporation, to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of B. M. Simmons.

Witness my hand this 6th day of March, 1947.

Alice J. Duck
Clerk.

COMPLAINT

B. N. SIMMONS,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA,
)	LAW SIDE.
BAKER ENGINEERING, INC.,)	
a Corporation,)	
Defendant.)	

COUNT ONE

The Plaintiff claims of the Defendant \$89.07, due from it by account on to-wit: the 30th day of September, 1946, which sum of money, together with interest thereon, is due and unpaid.

COUNT TWO

The Plaintiff claims of the Defendant \$89.07 due from it by account stated between the Plaintiff and Defendant on to-wit: October 1, 1946, which sum of money, together with interest thereon, is due and unpaid.

COUNT THREE

The Plaintiff claims of the Defendant the sum of \$89.07, due from it for money paid by the Plaintiff for the Defendant on to-wit: from September 1 to September 30, 1946, which sum of money, together with interest thereon, is due and unpaid.

Hyland & Ryan
Attorneys for Plaintiff.

An itemized, verified
statement of the account
sued on is attached hereto,
marked Exhibit "A", and made
a part hereof.

Hyland & Ryan
Attorneys for Plaintiff.

EXHIBIT "A"

BAKER ENGINEERING, INC., A CORPORATION, IN ACCOUNT WITH B.M. SIMMONS.

Money paid out by B. M. Simmons as a part of his expense
account from September 1, 1946 to September 30, 1946, for
travel expenses.....\$89.07.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, John Chason, A Notary Public in and
for said State and County, personally appeared B. M. Simmons, who
is known to me and who after being by me first duly and legally
sworn doth depose and say, under oath, as follows:-

That his name is B. M. Simmons; that he is the
Plaintiff in the above styled cause; that the annexed itemized
statement of the account due by Baker Engineering, Inc., a Corporation,
to him is true and correct, after allowing all just credits and that
the said sum of \$89.07, together with interest thereon is due and
unpaid.

B. M. Simmons

Sworn to and subscribed
before me this 6th day of
March, 1947.

John Chason
Notary Public, Baldwin County,
Alabama.

SIMMONS AND ~~BAKER ENGINEERING~~ COMPLAINT.

B. M. SIMMONS,

Plaintiff,

vs.

S Corporation,
BAKER ENGINEERING INC.,

Defendant,

BALDWIN COUNTY, ALABAMA,
IN THE CIRCUIT COURT OF

THE STATE

Filed March 6, 1947.

John Chason
Clerk.

10485

1042

SUMMONS AND ~~BILL OF~~ COMPLAINT.

B. M. SIMMONS,
Plaintiff,
vs.
BAKER ENGINEERING INC.,
a Corporation,
Defendant,

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

Filed March 6, 1947.

Alice J. Leach
Clerk.

Notary Public, Baldwin County,
Alabama.

March, 1947.

before me this 6th day of

Sworn to and subscribed

undersig.

B. M. Simmons

the said sum of \$99.01, together with interest thereon is due and
to him at this time and correct, after allowing all just credits and that
statement of the account due by Baker Engineering, Inc., a Corporation,
plaintiff in the above styled cause; that the annexed itemized

list his name is B. M. Simmons; that he is the
sworn debt debtor and say, under oath, as follows:-

is known to me and who after being by me first duly and legally
for said debts and County, personally appeared B. M. Simmons, who
Before me, John Chason, a Notary Public in and

BALDWIN COUNTY
STATE OF ALABAMA

travel expenses.....\$99.01.
account from September 1, 1946 to September 30, 1946 for
money paid out by B. M. Simmons as a part of his expense

BAKER ENGINEERING, INC., A CORPORATION, IN ACCOUNT WITH B. M. SIMMONS.
EXHIBIT "A"

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT IN
LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Baker Engineering, Inc., a corporation, to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of B. M. Simmons.

Witness my hand this 6th day of March, 1947.

Alice J. Muech
Clerk.

COMPLAINT

B. M. SIMMONS,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA,
VS.)	LAW SIDE.
BAKER ENGINEERING, INC.,)	
a Corporation,)	
Defendant.)	

COUNT ONE

The Plaintiff claims of the Defendant \$89.07, due from it by account on to-wit: the 30th day of September, 1946, which sum of money, together with interest thereon, is due and unpaid.

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The Plaintiff claims of the Defendant \$89.07 due from it by account stated between the Plaintiff and Defendant on to-wit: October 1, 1946, which sum of money, together with interest thereon, is due and unpaid.

COUNT THREE

The Plaintiff claims of the Defendant the sum of \$89.07, due from it for money paid by the Plaintiff for the Defendant on to-wit: from September 1 to September 30, 1946, which sum of money, together with interest thereon, is due and unpaid.

Hyatt & Pomeroy
Attorneys for Plaintiff.

An itemized, verified
statement of the account
sued on is attached hereto,
marked Exhibit "A", and made
a part hereof.

Hyatt & Pomeroy
Attorneys for Plaintiff.

EXHIBIT "A"

BAKER ENGINEERING, INC., A CORPORATION, IN ACCOUNT WITH B.M. SIMMONS.

Money paid out by B. M. Simmons as a part of his expense account from September 1, 1946 to September 30, 1946, for travel expenses.....\$89.07.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, John Chason, A Notary Public in and for said State and County, personally appeared B. M. Simmons, who is known to me and who after being by me first duly and legally sworn doth depose and say, under oath, as follows:-

That his name is B. M. Simmons; that he is the Plaintiff in the above styled cause; that the annexed itemized statement of the account due by Baker Engineering, Inc., a Corporation, to him is true and correct, after allowing all just credits and that the said sum of \$89.07, together with interest thereon is due and unpaid.

B. M. Simmons

Sworn to and subscribed
before me this 6th day of
March, 1947.

John Chason
Notary Public, Baldwin County,
Alabama.

B. M. SIMMONS,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA,
VS.)	LAW SIDE.
BAKER ENGINEERING, INC.,)	
a Corporation,)	
Defendant.)	

STATE OF ALABAMA

BALDWIN COUNTY

Before me, John Chason, a Notary Public, in and for said State and County, personally appeared B. M. Simmons, who is known to me and who after being by me first duly and legally sworn doth depose and say, under oath, as follows:-

That his name is B. M. Simmons; that he is the Plaintiff in the above styled cause; that Baker Engineering, Inc., a Corporation, is justly indebted to him in the sum of \$89.07, together with interest thereon, after allowing all just credits and offsets; that the Defendant is a non-resident corporation; that the attachment to be issued in the above styled cause is not sued out for the purpose of vexing or harassing the said Defendant; that the Plaintiff in the above styled cause elects not to give bond.

B. M. Simmons

Sworn to and subscribed
before me a Notary Public
this 6th day of March, 1947.

John Chason
Notary Public, Baldwin County,
Alabama.

1042.

SUMMONS AND ~~BILL OF~~ COMPLAINT.

B. M. SIMMONS,

Plaintiff,

VS.

BAKER ENGINEERING INC.,
a Corporation,

Defendant,

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

Filed March 6, 1947.

Alvin J. Smith
Clerk.

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

Whereas B. M. Simmons, hath complained on oath, to me, Alice J. Duck as Clerk of the Circuit Court of Baldwin County, Alabama, that Baker Engineering, Inc., a Corporation, is justly indebted to the Plaintiff in the sum of \$89.07, together with interest thereon, and the Plaintiff having made Affidavit and elected not to give bond, as required by law, you are hereby commanded to attach so much of the estate of Baker Engineering, Inc., a Corporation, as will be of value to satisfy the said debt and costs, according to the Complaint; and such estate, unless replevied, so to secure that the same may be liable to further proceedings thereon, to be had in the Circuit Court for Baldwin County, Alabama, to be held at the Courthouse thereof; when and where you must make known how you have executed this Writ.

Witness my hand and seal as Clerk of the Circuit Court, of Baldwin County, Alabama, this 6th day of March, 1947.

Alice J. Duck
Clerk.

WRIT OF ATTACHMENT

Received in Sheriff's Office
this 8 day of *Mar*, 1947.
TAYLOR WILKINS, Sheriff

B. M. SIMMONS,

Plaintiff

VS.

BAKER ENGINEERING, INC.,
a Corporation,

Defendant.

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

Filed March 6, 1947.

Alice J. Leitch
Clerk.

Executed this 8th
Day of March 1947
by taking the following
described property
in my possession
one *Federal* Automatic Calculator
one Transit & Tripod
Levelling & Tripods
Taylor Wilkins
Sheriff

B. M. SIMMONS,

Plaintiff

VS

BAKER ENGINEERING, INC.,
a Corporation,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1042

GENERAL APPEARANCE AND PLEA

Now comes the Defendant and for general appearance in this cause and for plea to the Complaint and to each and every count thereof, separately and severally says:

1. Not guilty.

Gordon & Gordon

J. T. Bladell

Attorneys for Defendant

PLEA

B. M. SIMMONS,

Plaintiff,

VS

BAKER ENGINEERING, INC.,
a Corporation,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1042

Filed

5-1-47

Alice J. Lucke
clerk

105-3-30-24-31
105-3-30-24-31

RETURN RECEIPT

Rescued from the Prostitution & Registered or Licensed

THE
FEDERAL
BUREAU OF
INVESTIGATION
U. S. DEPARTMENT OF JUSTICE

THE UNIVERSITY OF CHICAGO

if we had a common enemy with

[illegible]

152

461

Post Office Department
OFFICIAL BUSINESS

PERMIT FOR PRIVATE USE TO VOID DAMAGE TO POSTAGE
POSTMAN OF DELIVERING
OFFICE

Return to *Alvin J. Dink, Cashier*
(NAME OF BENEFITARY)
Street and Number,
or Post Office Box
REGISTERED ARTICLE
No. *964*
INSURED PARCEL
Post Office *Gray Minnesota, Minn.*
State *Minneapolis, Minn.*

No. *10-12231*