STATE OF ALABAMA COUNTY

BALDWIN

IN THE CIRCUIT COURT . . . LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Roscoe Jackson and Edna Jackson Steadham, a partnership, to appear within thirty (30) 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 H. Kennedy.

WITNESS my hand this 30th day of August, 1949.

- COMPLAINT -

H. KENNEDY,

Plaintiff,

-vs-

ROSCOE JACKSON and EDNA JACKSON STEADHAM, a partnership,

Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAW SIDE

The plaintiff claims of the defendant One Thousand Six Hundred Eight-five & 36/100 Dollars (\$1,685.36) due from them for money loaned by the plaintiff to the defendant, and for merchandise, goods and chattels sold by the plaintiff to the defendant between the 18th day of February, 1947, and the 17th day of March, 1949, this being the last item of the account, with the last credit having been made on the 13th day of June, 1949, which sum of money, with the interest thereon, is still unpaid.

for Plaintiff

Partners are believed to be: Roscoe Jackson, Foley, Alabama; Edna Jackson Steadham, Houston, Texas. Received in Sherill's Office this 30 day of June, 1949 TAYLOR WILLINS, Sherill

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SUMMONS AND COMPLAINT - . .

H. KENNEDY,

Plaintiff,

·~VS

ROSCOE JACKSON and EDNA JACKSON STEADHAM, a partnership,

Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA LAW SIDE

JUN 30 1949 🛬

AUCE J. DUCK, Clerk CECIL G. CHASON

ATTORNEY AT LAW

FOLEY, ALABAMA

August 4, 1949.

Mrs. Alice J. Duck, Clerk,

Bay Minette, Ala.

Dear Mrs. Duck:

I am enclosing herewith answer to the complaint filedin the cause, H. Kennedy Vs.

Roscoe Jackson, et al. #1371.

Will you please file this answer or pleas in said cause and oblige.

Yours very truly,

Copy 30 c. G. Chacon

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## CECIL G. CHASON

ATTORNEY AT LAW

FOLEY, ALABAMA 29 June 1949

Mr. Taylor Wilkins, Sheriff, Bay Minette, Ala.

Dear Taylor:-

I have this day mailed to Mrs. Duck a complaint against Roscoe Jackson and his mother, Edna Jackson Stead-ham, who were doing business as a partnership at Foley. I believe service on Roscoe Jackson as a partner is all that will be required.

Yours very truly,

C. Ghasen

CGC:ln

cc: Mrs. Alice J. Duck Bay Minette, Ala.