

FIELD ENTERPRISES, INC.,
A CORPORATION,

PLAINTIFF

VS

SARA J. JOHNSON

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

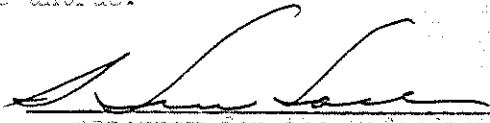
LAW BOOK

NO. 1615


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

1.

That the facts therein alleged are untrue.


Attorney for the Defendant

The Defendant demands a trial by jury.


Attorney for the Defendant

RECORDED
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FIELD ENTERPRISES INC.,
A CORPORATION,

PLAINTIFF

VS

SARA J. JOHNSON

DEFENDANT

ANSWER

FILED

MAR 24 1951

ALICE J. DUCK, Clerk

From the law office of
Hubert M. Hall
Bay Minette, Alabama

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Sara J. Johnson 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 Field Enterprises, Inc., a Corporation.

Witness my hand this 21st day of February, 1951.

W. A. L. L. L.
Clerk.

COMPLAINT:

FIELD ENTERPRISES, INC.,
A Corporation,

Plaintiff,

vs.

SARA J. JOHNSON,

Defendant.

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

COUNT ONE:

The Plaintiff claims of the Defendant Ninety-nine and 33/100 Dollars (\$99.33) due from her by account on the 14th day of April, 1949, which sum of money with the interest thereon is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Ninety-nine and 33/100 Dollars (\$99.33) for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 29th day of October, 1948, which sum of money, together with the interest thereon from April 14, 1949, is still unpaid.

CHASON & STONE

By:

M. P. Stone
Attorneys for Plaintiff.

There is attached hereto an itemized, verified statement of the account sued on.

M. P. Stone

Chicago, Dec r 7 1950

Hurricane, Alabama

W-109956

10/29/48	1	set of THE WORLD BOOK		10/29/48	Down payment	\$ 10 00
		ENCYCLOPEDIA	\$ 129 00	12/8/48	Paid	6 00
		Tax	2 58	1/12/49	"	6 00
		Transportation	1 75	3/3/49	"	6 00
			\$ 133 33	4/14/49	"	6 00
					Total paid	\$ 34 00
					Balance due	\$ 99 33

STATE OF ILLINOIS)
COUNTY OF COOK)ss

Alfred Ross, being first duly sworn on oath, deposes and says that he is the Credit Manager for FIELD ENTERPRISES, INC., assignee of The Quarrie Corporation by way of statutory merger, and that the above statement is true and correct according to his knowledge and belief.

Subscribed and sworn to before me this 7th day of December, 1950.

Alfred Ross
Credit Manager

Moreno J. Landon
Notary Public

My Commission Expires June 4, 1951

Received in Sheriff's Office
this 21 day of Feb. 1951
TAYLOR WILKINS, Sheriff

Executed Feb. 21 1951
by serving copy of within Summons and
return on

Sara J. Johnson

Taylor Wilkins Sheriff
By G. F. Hall Deputy Sheriff

NO 1615- RECORDED

SUMMONS AND COMPLAINT

FIELD ENTERPRISES, INC.,
A Corporation,

Plaintiff,

vs.

SARA J. JOHNSON,

Defendant.

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

FILED
FEB 21 1951
ALICE J. DUCK, Clerk

LAW OFFICES
HYBART, CHASON & STONE
BAY MINETTE, ALABAMA