

FIELD ENTERPRISES, INC.,
A CORPORATION,

PLAINTIFF

VS

INEZ MADDOX

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

No. 1616

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

1.

The facts therein alleged are untrue.

2.

That the account sued on was paid in full before the commencement
of the suit.


Attorney for Defendant

The Defendant demands a trial by jury.


Attorney for Defendant

RECORDED

FIELD ENTERPRISES INC.,
A CORPORATION,

PLAINTIFF

VS

INEZ MADDOX

DEFENDANT

ANSWER

FILED
MAR 3 1951
ALICE J. DUCH, Clerk

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 Inez Maddox 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.

Amie L. Lusk
Clerk.

COMPLAINT:

FIELD ENTERPRISES, INC.,
A Corporation,

Plaintiff,

vs.

INEZ MADDOX,

Defendant.

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

COUNT ONE:

The Plaintiff claims of the Defendant One Hundred Five and 33/100 Dollars (\$105.33) due from her by account on the 7th 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 One Hundred Five and 33/100 Dollars (\$105.33) for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 13th day of August, 1948, which sum of money, together with the interest thereon, from April 7, 1949, is still unpaid.

CHASON & STONE

By: Melone P. Stone
Attorneys for Plaintiff.

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

Melone P. Stone

Chicago, December 7 50

Stapleton, Alabama

W-93979

A-043-JO

8/13/48	1	set of THE WORLD BOOK	8/13/48	Down payment	\$ 10 00
		ENCYCLOPEDIA	10/14/48	Paid	6 00
		Tax	2/10/49	"	6 00
		Transportation	4/7/49	"	6 00
		\$ 133 33		Total paid	\$ 28 00
				Balance due	\$ 105 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.

Alfred Ross
Credit Manager

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

Alfred E. Larson
Notary Public

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

Executed Feb. 21 1951
By serving copy of the
Within Summons & Complaint
on Inez Maddox

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

701616

RECORDED

SUMMONS AND COMPLAINT

FIELD ENTERPRISES, INC.,
A Corporation,

Plaintiff,

vs.

INEZ MADDOX,

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