

1479

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA. GREETINGS:

You are hereby commanded to summon L. E. Bailey to appear at the next term of the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Watson Hardware Company, a corporation, Atmore, Alabama.

Witness my hand this 24th day of March, 1950.

David J. Church
CLERK

WATSON HARDWARE COMPANY,
A CORPORATION,
ATMORE, ALABAMA,

PLAINTIFF

VS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
LAW SIDE. NO. _____.

L. E. BAILEY,
DEFENDANT

COUNT ONE: The plaintiff claims of the defendant the sum of One Hundred Four and 41/100 (\$104.41) Dollars due by the defendant to the plaintiff on open account on, to-wit, October 26, 1949, which said sum of money together with the interest thereon is still due and unpaid.

COUNT TWO: The plaintiff claims of the defendant the sum of One Hundred Four and 41/100 (\$104.41) Dollars due by the defendant to the plaintiff on account stated on, to-wit, October 26, 1949, which said sum of money together with the interest thereon is still due and unpaid.

COUNT THREE: The plaintiff claims of the defendant the sum of One Hundred Four and 41/100 (\$104.41) Dollars due by the defendant to the plaintiff for goods, wares and merchandize sold by the plaintiff to the defendant from on, to-wit, September 19, 1949 to October 26, 1949, which said sum of money together with the interest thereon is still due and unpaid.

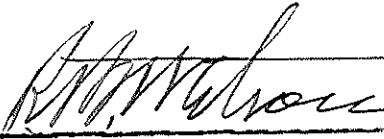
The plaintiff has attached to the original complaint filed in this cause an itemized and verified statement of the account of the defendant with the plaintiff and gives notice that the same will be used in evidence at the trial of said cause.

Hugh Rozelle
ATTORNEY FOR PLAINTIFF

STATE OF ALABAMA

ESCAMBIA COUNTY

Before me, the undersigned authority in and for said State and County, personally appeared R. B. Watson, President, Watson Hardware Company, a corporation, who is known to me and being by me first duly sworn doth depose and say that the attached statement of account of L. E. Bailey is a true and correct statement thereof; and that after all just credits and offsets are given the said L. E. Bailey is indebted to the said Watson Hardware Company, a corporation in the sum of \$104.41.



Sworn to and subscribed before me this 23 day of

March, 1950.



NOTARY PUBLIC



RECORDED

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

LAW SIDE. NO. 1479.

WATSON HARDWARE COMPANY,
A CORPORATION,
PLAINTIFF

VS.

L. M. BAILEY,
DEFENDANT

FILED 3-24-50

J. A. J. J. J.
CLERK

HUGH ROZELLE
ATTORNEY AT LAW
ATMORE, ALABAMA

Received in Sheriff's Office
this 26 day of April, 1950
TAYLOR, Sheriff

RECEIVED IN OFFICE

APR 18 1950

113 Davis Circle
Montgomery Ala.

17 April 1950

Not found in my county after diligent search and in-
quiry.

W. L. Sullivan, Sheriff

H. F. Hall
Deputy Sheriff

Not found in my
County 4/19/50
J. A. Mosley, Sheriff

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CIRCUIT COURT

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Witness my hand this 24th day of March, 1950.

Hugh Rozelle
CLERK

WATSON HARDWARE COMPANY,
A CORPORATION,
ATMORE, ALABAMA,
PLAINTIFF

VS.

L. E. BAILEY,
DEFENDANT

IN THE CIRCUIT COURT OF
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Hugh Rozelle
ATTORNEY FOR PLAINTIFF

201479

Copy for Defendant
L. E. Bailey
113 Davis circle
Montgomery

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

LAW SIDE. NO. _____.

WATSON HARDWARE COMPANY,
A CORPORATION,
PLAINTIFF

VS.

L. E. BAILEY,
DEFENDANT

FILED 3-24-50.

Alvin J. Leach
CLERK

HUGH ROZELLE
ATTORNEY AT LAW
ATMORE ALABAMA

Returned 17 day of April 1950
Not found in my county after diligent search and in-
quiry. as to L. E. Bailey

By H. F. Hall
Deputy Sheriff

6679

68.14
32.88
13.88
10.49 -
104.41*
418

plus
interest

L.F. BAILEY
Account 08.59

