

LOCAL TELEPHONE 127-R L. D. TELEPHONE 101 TWX FOLEY 367

IRWIN & SON

GROWERS AND SHIPPERS

Irish Potatoes, Cucumbers, Green Corn, Cabbage and Sweet Potatoes

FOLEY, ALABAMA

4-16-51

REFERENCES:

FARMERS & MERCHANTS FOLEY, ALABAMA

> FIRST NATIONAL BANK MOBILE, ALABAMA

RATING AGENCIES:

Account of H.L.Plerce

Fairhope, Alas

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6 tons 4-10-7 fertilizer 2-8-50 6 tons 4-10-7 fertilizer 3-20-50 1 ton Nitrate of Soda. 5-3-50

Credit 7-51

223,50 223.50 65,00

\$312.00

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Cecil G. Chason, a Notary Public in and for said County in said State, personally appeared Francis Irwin, who is known to me, and who after being by me first duly and legally sworn, deposes and says under oath as follows:

That his name is Francis Irwin; that he is a partner of the firm of L. Irwin & Son and, as such partner, is familiar with the books and records thereof; that the amount of \$312.00 shown as being the balance due on the foregoing account of H. L. Pierce is still due and unpaid, along with the interest thereon, after allowing all just credits and offsets.

Sworn to and subscribed before me, a Notary Public, on this 27

of February,

State of Alabama

gilid 4-19.51 aug Jaenen

	IN THE CIRCUIT COURT LAW SIDE
BALDWIN COUNTY)	
TO ANY SHERIFF OF THE	STATE OF ALABAMA:
You are hereby	commanded to summons H. L. Pierce to appear
within thirty (30) days	s from the service of this writ in the Circui
Court to be held for sa	aid county at the place of holding same, then
and there to answer the	e complaint of L. Irwin & Son, a partnership.
WITNESS my hand	this 19th day of April, 1951.
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	Oleik .
	- COMPLAINT -
L. IRWIN & SON, a parti	ner-) (
ship composed of L. TRY and FRANCIS IRWIN,) (IN THE CIRCUIT COURT OF
Plaint	iff,) (BALDWIN COUNTY, ALABAMA
-vs-) (LAW SIDE
· ·	· · · · · · · · · · · · · · · · · · ·

The plaintiff claims of the defendant Five Hundred and Twelve Dollars (\$512.00) for merchandise, goods and chattels sold by the plaintiff to the defendant as follows: February 8, 1950, \$223.50; March 20, 1950, \$223.50; May 3, 1950, \$65.00, which sum of money, with the interest thereon, is still unpaid.

) (

Defendant.

Attorney for Plaintiff

H. L. PIERCE,

Received in Sherin's Obice this Aday of Add 195/ 1639 Executed 5. 4-51 By serving ()()()()()()()()()

Surmore + complaint on SUMMONS AND COMPLAINT

14. L. Prierce

()()()()()()()()() Taylor Wilhing Sheriff. 14.7. Hall D.S. L. IRWIN & SON, a partnership composed of L. IRWIN and FRANCIS IRWIN, Plaintiff, -VS-H. L. PIERCE, Defendant. ()()()()()()()()()IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA LAW SIDE CECIL G. CHASON APR 19 1951 ALICE J. BUCK, Clerk

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