

CHARLES SHOE COMPANY,

Plaintiff,

VS.

EDWARD ENGEL, individually
and doing business as ENGEL'S
DEPARTMENT STORE,

Defendant.

NO. 1794

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

ANSWER

COUNT I:

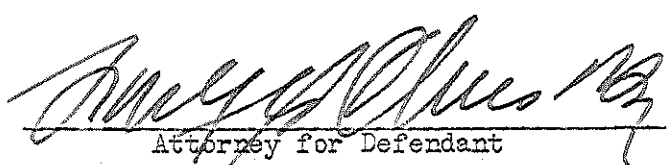
The Defendant, for answer to each count of the complaint and saith
that the account is barred by the statute of limitations of three years.

COUNT II:

The Defendant for answer to each count of said complaint saith that
he is not indebted to the Plaintiff.

COUNT III:

The Defendant for answer to each count of said complaint, saith that
he has paid said debt, for the recovery of which this suit was brought before
the action was commenced.


Attorney for Defendant

RECEIVED FOR RECORDING

[Handwritten signature]

THE COURT OF THE BALDWIN COUNTY, ALABAMA, in and for the County of Baldwin, State of Alabama, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the records of the Court.

CHARLES SHOE COMPANY,

PLAINTIFF

VS:

EDWARD ENGEL, Individually and doing business as ENGEL'S DEPARTMENT STORE,

DEFENDANT

NO. 1794

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

FILED
MAY 20 1952
ALICE J. DUCK, 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 Edward Engel, individually and doing business as Engel's Department Store, Elberta, Alabama, 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 Charles Shoe Company.

Witness my hand this 21st day of April, 1952.

Archie J. Leach
Clerk.

CHARLES SHOE COMPANY,

Plaintiff,

vs.

EDWARD ENGEL, individually
and doing business as ENGEL'S
DEPARTMENT STORE,

Defendant.

COMPLAINT

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

COUNT ONE:

The Plaintiff claims of the Defendant Two Hundred Fifty-three and 10/100 Dollars (\$253.10) due from him by account on the 20th day of September, 1950, which sum of money with the interest thereon is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Two Hundred Fifty-three and no/100 Dollars (\$253.10) due for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 20th day of September, 1950, which sum of money, together with the interest thereon from September 20, 1950, is still unpaid.

CHASON & STONE

By: M. J. Stone
Attorneys for the Plaintiff.

SUMMONS AND COMPLAINT

Executed April, 29, 1952

By Serving Copy on

Edward Engel

CHARLES SHOE COMPANY,

Plaintiff,

vs.

EDWARD ENGEL, individually and
doing business as ENGEL'S
DEPARTMENT STORE,

Defendant.

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

FILED

APR 21 1952

ALICE J. DUCK, Clerk

LAW OFFICES

~~BY MAIL~~ CHASON & STONE

BAY MINETTE, ALABAMA

Shenff

Taylor Wilkins

By

Edleigh Steadham