

1862

SUMMONS

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

YOU ARE HEREBY COMMANDED to summon H. A. GUNNISON to appear and plead, answer, or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against H. A. GUNNISON, by AMCO FEED STORE, INC.

WITNESS my hand this the 16<sup>th</sup> day of September, 1952.

David H. Smith  
Clerk

\*\*\*\*\*

COMPLAINT

|                        |   |                         |
|------------------------|---|-------------------------|
| AMCO FEED STORE, INC., | ) |                         |
|                        | ) |                         |
| PLAINTIFF              | ) | IN THE CIRCUIT COURT OF |
|                        | ) |                         |
| VS:                    | ) | BALDWIN COUNTY, ALABAMA |
|                        | ) |                         |
|                        | ) | AT LAW                  |
| H. A. GUNNISON,        | ) |                         |
|                        | ) |                         |
| DEFENDANT              | ) |                         |
|                        | ) |                         |

COUNT I:

The Plaintiff claims of the Defendant the sum of ONE THOUSAND NINETEEN & 24/100 DOLLARS (\$1,019.24), together with interest thereon, due from him by account on, to wit: the 29th day of August, 1952, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of ONE THOUSAND NINETEEN & 24/100 DOLLARS (\$1,019.24), together with interest thereon, due from him on account stated between the Plaintiff and the Defendant on, to wit: the 29th day of August, 1952, which sum of money with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant the sum of ONE THOUSAND NINETEEN & 24/100 DOLLARS (\$1,019.24), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant, on to wit: the 29th day of August, 1952, w hich sum of money, with interest thereon, is still unpaid.

There is attached and made a part hereof, an itemized statement of account, sworn to before a Notary Public on the 29th day of August, 1952, by the Assistant-Secretary Treasurer of Plaintiff.

The Defendant resides at Fairhope, Alabama.

David H. Smith  
Attorney for Plaintiff

AMCO FEED STORE, INC.  
VS:  
H. A. GUNNISON, INC.

AMCO FEED STORE, INC. is a corporation organized under the laws of the State of Alabama, and has its principal office at Birmingham, Alabama. It is engaged in the business of buying and selling feed and other commodities, and is a member of the Alabama Feed Dealers Association.

*[Handwritten signature]*

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COMPLAINT

AMCO FEED STORE, INC. vs. H. A. GUNNISON, INC.  
COUNTY OF BALDWIN, ALABAMA

H. A. GUNNISON

DEFENDANT

FILED

AMCO FEED STORE, INC. is a corporation organized under the laws of the State of Alabama, and has its principal office at Birmingham, Alabama. It is engaged in the business of buying and selling feed and other commodities, and is a member of the Alabama Feed Dealers Association.

FILED

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AMCO FEED STORE, INC.  
VS:  
H. A. GUNNISON, INC.

SUMMONS & COMPLAINT

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

STATEMENT  
AMCO FEED STORES, INC. FT. WAYNE, IND.  
Robertsdale, Alabama

A. Gunnison  
Fairhope, Ala.

Broiler Finance Agreement #1

| <u>Charges</u> | <u>Credits</u> | <u>Balance</u> |
|----------------|----------------|----------------|
| 8/51 \$ 33.66  |                |                |
| 830.09         |                |                |
| 64.26          |                |                |
| 128.52         |                |                |
| 155.45         |                |                |
| 200.58         |                |                |
| 62.22          |                |                |
| 342.21         |                |                |
| 293.56         |                |                |
| 251.02         |                |                |
| 248.88         |                |                |
| 248.88         |                |                |
| 259.59         |                | \$3118.92      |
| ----           | \$1858.03      | 1260.89        |
| ----           | 30.50          | 1230.39        |
| ----           | 872.01         | 358.36         |

8/52 Balance due

\$ 358.36

Broiler Finance Agreement #201

| <u>Charges</u>  | <u>Credits</u> | <u>Balance</u> |
|-----------------|----------------|----------------|
| 8/25/1 \$ 31.62 |                |                |
| 9/15 101.75     |                |                |
| 9/22 750.50     |                |                |
| 9/29 64.77      |                |                |
| 10/6 20.00      |                |                |
| 10/13 208.63    |                |                |
| 10/20 412.21    |                |                |
| 10/27 251.32    |                |                |
| 11/3 94.25      |                |                |
| 11/10 640.67    |                |                |
| 11/17 253.48    |                |                |
| 11/24 566.55    |                |                |
| 12/1 219.91     |                | \$3615.66      |
| 12/8            | \$2406.90      | 1208.76        |
| 12/22           | 358.33         | 850.43         |
| 2/23/52         | 189.55         | 660.88         |

2/29/52 Balance due

\$ 660.88

Total due on two contracts \$1019.24

ements attached

I, Miller B. Curless, who is Assistant-Secretary Treasurer of Amco Feed Stores, Inc., do hereby certify that the above account is true and correct after allowing all due credits as of August twenty ninth, nineteen hundred and fifty-two (8/29/1952).

Miller B Curless

Sworn to and subscribed before me this 29th day  
of August, 1952.

Notary Public (seal)

My commission expires Feb. 25, 1955

this 16 day of Sept. 1952  
TAYLOR WILKINS, Sheriff

no 1862

Executed Nov. 21. 1952  
By signing copy on  
H. A. Gunnison

AMCO FEED STORE, INC.

PLAINTIFF

VS:

H. A. GUNNISON,

DEFENDANT

SUMMONS & COMPLAINT

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

Filed 9-16-52  
Alvin J. Remick  
Clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

Sheriff  
Taylor Wilkins  
By  
Edleigh Steadham

AMCO FEED STORE, INC.,

Plaintiff,

vs.

H. A. GUNNISON,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO 1862.

Comes now the Defendant by his attorneys, and for answer to the Complaint heretofore filed against him and to each count thereof, separately and severally, says as follows:

1. That the allegations of the Complaint are untrue.

CHASON AND STONE

BY:

Melburn S. Stone  
Attorneys for Defendant.

The defendant demands a trial  
of this cause by Jury.

CHASON AND STONE

BY:

Melburn S. Stone  
Attorneys for Defendant.

ANSWER

AMCO FEED STORE, INC.,

Plaintiff,

vs.

H. A. GUNNISON,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW.

NO. 1862.

FILED

DEC 19 1952

ALICE J. DUCK, Clerk

LAW OFFICES

**CHASON & STONE**

BAY MINETTE, ALABAMA