

1866

A N S W E R

L. J. RICHARD, AND COMPANY,
a Partnership, composed of
L. J. Richard and Ralph M.
Harold,

Plaintiff,

VS

PAT BROCK,

Defendant.

IN THE CIRCUIT COURT OF

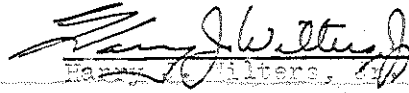
BALEWIN COUNTY, ALABAMA

AT LAW

Now comes the defendant for answer to the Plaintiff's Bill of Complaint
says:

ONE

That the facts therein alleged are untrue.



Harry J. Walters, Jr.
Attorney for the Defendant

1866

FILED

OCT 23 1952

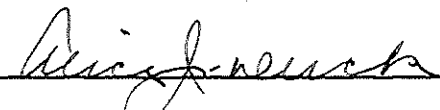
ALICE J. DUCK, Clerk

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon PAT BROCK 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 L. J. RICHARD AND COMPANY, a Partnership, composed of L. J. Richard and Ralph A. Harold.

WITNESS my hand this 26th day of September, 1952.


Clerk of the Circuit Court of
Baldwin County, Alabama.

* * * * *

COMPLAINT

L. J. RICHARD AND COMPANY,
a Partnership, composed of
L. J. Richard and Ralph A.
Harold,

VS. Plaintiff,


PAT BROCK,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

The plaintiff claims of the defendant the sum of Seventy-five Dollars (\$75.00) due from the defendant by account on, to-wit, April 11, 1950, which sum of money, with the interest thereon, is still due and unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is attached hereto as Exhibit A and made a part hereof.


Attorney for Plaintiff.

STATE OF ALABAMA)
*
MOBILE COUNTY)

Before me, the undersigned authority, within and for said County in said State, personally appeared RALPH A. HAROLD, who, after being by me first duly and legally sworn, deposes and says:

That the attached itemized statement of account against Pat Brock is true, correct, justly due and unpaid.

Ralph A. Harold

Sworn to and subscribed before me on
this the 15th day of September, 1952.

Maricita Hardesty

Notary Public, Mobile County, Alabama.

MOBILE, ALA.

April 11, 1950

Mr. Pat. Brock

Loxley, Alabama

TO L. J. RICHARD & COMPANY, DR.

CERTIFIED PUBLIC ACCOUNTANTS

P. O. BOX 1023

MOBILE, ALABAMA

To: Professional services rendered in connection with
reviewing and closing books as of December 31,
1949; preparation of financial statements; and
also preparation of amended state and federal
individual income tax returns for 1949 \$75.00

EXHIBIT A

OUR INVOICE BEING FOR PERSONAL SERVICES SHOULD BE PAID UPON PRESENTATION
DETAILS OF OUR WORK WILL BE SUBMITTED UPON REQUEST

Received in Sheriff's Office
This 22 day of Sept, 1952
TAYLOR WILKINS, Sheriff

ted Sept 27 1952
by serving copy of within Summons and
Complaint on

Pat Brock

Taylor Wilkins Sheriff

By Pete Sellers Deputy Sheriff

1866
SUMMONS AND COMPLAINT

L. J. RICHARD AND COMPANY, a
Partnership, composed of L. J.
Richard and Ralph A. Harold,

Plaintiff,

VS.

PAT BROCK,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED
SEP 26 1952
ALICE J. DUCK, Clerk

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA