

1867

A N S W E R

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

Plaintiff,

VS

BROCK-MOSLEY PACKING COMPANY,
a Partnership, composed of
Mattie Brock and Alfred Mosley,
and MATTIE BROCK and ALFRED
MOSLEY, individually,

Defendants,

IN THE CIRCUIT COURT OF

ST. LOUIS COUNTY, ALABAMA

AT LAW

Now comes the defendants 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 Defendants

FILED
OCT 28 1952
WILLIAM J. BICK, Clerk

A N S W E R

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

Plaintiff,

VS

BROCK-MOSLEY PACKING COMPANY,
a Partnership, composed of
Mattie Brock and Alfred Mosley,
and MATTIE BROCK and ALFRED
MOSLEY, individually.

Defendants.

IN THE CIRCUIT COURT OF


BALDWIN COUNTY, ALABAMA

AT LAW

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

ONE

That the facts therein alleged are untrue.


Harry J. Wilters, Jr.
Attorney for the Defendants

1867

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 BROCK-MOSLEY PACKING COMPANY, a Partnership, composed of Mattie Brock and Alfred Mosley, and MATTIE BROCK and ALFRED MOSLEY, individually, 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.

Alfred J. Brock

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,

Plaintiff,

VS.

BROCK-MOSLEY PACKING COMPANY,
a Partnership, composed of
Mattie Brock and Alfred Mosley,
and MATTIE BROCK and ALFRED
MOSLEY, individually,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

The plaintiff claims of the defendants the sum of One Hundred Fifty Dollars (\$150.00) due from the defendants by account on, to-wit, March 13, 1950 and 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.

J. B. Blackburn
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 Brock-Mosley Packing Company, a partnership, composed of Mattie Brock and Alfred Mosley, is true, correct, justly due and unpaid.

Ralph A. Harold.

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

Marista Hardesty

Notary Public, Mobile County, Alabama.

MOBILE, ALA.

March 13, 1950

Brock-Mosley Packing Company

Loxley, Alabama

TO L. J. RICHARD & COMPANY, DR.

CERTIFIED PUBLIC ACCOUNTANTS

P. O. BOX 1023

MOBILE, ALABAMA

To: Professional services rendered in connection with
the preparation of 1949 state and federal partnership
income tax returns; also, 1949 state and federal
individual income tax returns and 1950 declaration
of estimated tax for Alfred and Murel Mosley \$75.00

EXHIBIT A

MOBILE, ALA.

April 11, 1950

Brock-Mosley Packing Company

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 amended partnership income tax returns and individual income tax returns for Alfred and Murel Mosley for 1949 together with claims for refund \$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 26 day of Sept, 1952
TAYLOR WILKINS, Sheriff

Executed _____ 19 ____
by serving copy of within Summons and
Complaint on

Mattie Brock 9-27-52
Alfred Mosley 9-30-52

Taylor Wilkins Sheriff
By H. F. Hall Deputy Sheriff

70 1867
SUMMONS AND COMPLAINT

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

Plaintiff,

VS.

BROCK-MOSLEY PACKING COMPANY, a
Partnership, composed of Mattie
Brock and Alfred Mosley, and
MATTIE BROCK and ALFRED MOSLEY,
individually,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

1867
FILED
SEP 26 1952
ALICE J. DUCK, Clerk

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