

1868

A N S W E R

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

Plaintiff,

VS

PAT BROOK and MARTIE BROOK,

Defendants.

IN THE CIRCUIT COURT OF

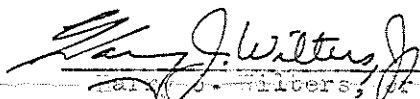
BALDWIN COUNTY, ALABAMA

AT LAW

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

ONE

That the facts therein alleged are untrue.



Ray J. Walters, Jr.  
Attorney for the Defendants

1868

FILED

OCT 23 1952

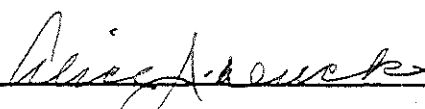
ALICE J. BUCK, Clerk

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon PAT BROCK and MATTIE 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 26<sup>th</sup> day of September, 1952.

  
Clerk of the Circuit Court of Baldwin  
County, Alabama.

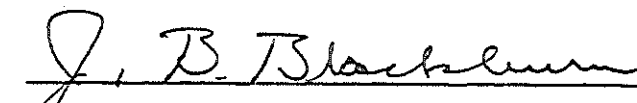
\* \* \* \* \*

COMPLAINT

L. J. RICHARD AND COMPANY, a Partnership, composed of L. J. Richard and Ralph A. Harold,	)	
	)	
	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
VS.	)	AT LAW
	)	
PAT BROCK and MATTIE BROCK,	)	
Defendants.	)	

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 15, 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* \*  
~~BALDWIN~~ 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 and Mattie Brock is true, correct, justly due and unpaid.

*Ralph A. Harold*

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

*Marcia Hardesty*

Notary Public, Mobile County, Alabama.

MOBILE, ALA.

March 15, 1950

Pat and Mattie Brock

Loxley, Alabama

TO L. J. RICHARD & COMPANY, DR.

CERTIFIED PUBLIC ACCOUNTANTS

P. O. BOX 1023

MOBILE, ALABAMA

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To: Professional services rendered in connection with  
the preparation of 1949 state and federal individual  
income tax returns; also, preparation of 1950  
declaration of estimated tax . . . . . \$150.00

EXHIBIT A

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

TAYLOR WILKINS, Sheriff

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

Pat Brock  
Mattie Brock

Taylor Wilkins Sheriff  
By Pete Sellers Deputy Sheriff

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

Plaintiff,  
VS.

PAT BROCK and MATTIE BROCK,  
Defendants.

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