

1923

STATE OF ALABAMA }
BALDWIN COUNTY }

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ERNESTINE HARDY, DOING business as Hardy's New Stand, 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 JOHN VELLA & SONS, a Partnership consisting of JOHN VELLA, Jr., FRANCIS VELLA AND EMMA VELLA.

WITNESS my hand this 13th day of February, 1953.

Reichle
Clerk

JOHN VELLA & SONS, a
Partnership, consisting of
John Vella, Jr., Francis
Vella and Emma Vella,
Plaintiff,

VS.

ERNESTINE HARDY, doing
business as Hardy's News Stand,
Defendant.

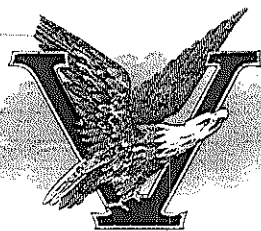
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

COMPLAINT

The Plaintiff claims of the Defendant the sum of Three Hundred Nine and 30/100 Dollars (\$309.30) due from the defendant by account on to-wit: February 1, 1953, 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.

James R. Owen
Attorney for Plaintiff



JOHN VELLA & SONS

WHOLESALE

FRUIT AND PRODUCE

6 & 8 N. COMMERCE

P. O. BOX 43

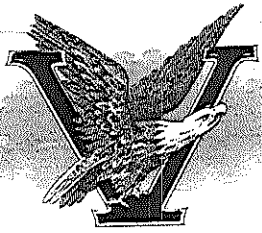
DIAL 2-7028

Mobile, Alabama

To:
Hardy's News Stand
Bay Minette, Ala.

ESHIBIT A

Dec. 5, 1952	1 box 210 tangerines @	4.50	4.50	
	1 " grapes	5.00	5.00	
	1 " tomatoes	5.25	5.25	
	1 " bananas	5.50	5.50	
	1 sk Jumbo onions	5.25	5.25	
	1 " Ida Potatoes	6.50	6.50	
	2 doz lettuce	2.12½	4.25	36.25
Dec. 8,	1 box bananas	5.50	5.50	
	1 " tomatoes	5.25	5.25	
	2 doz lettuce	2.12½	4.25	
	1 box oranges	4.50	4.50	
	½ bu kumquats	4.50	2.25	21.75
Dec 12	25 coconuts	.10	2.50	
	½ box grapefruit	4.50	2.25	
	2 doz lettuce	2.12½	4.25	
	1 box tomatoes	5.25	5.25	
	1 " bananas	5.50	5.50	
	1 sk Ida potatoes	6.50	6.50	
	1 bu kumquats	4.75	4.75	31.00
Dec. 15	1 sk Ida potatoes	6.50	6.50	
	1 box 88 apples	6.50	6.50	
	3 doz lettuce	2.00	6.00	
	1 lug tomatoes	5.25	5.25	
	1 box bananas	5.50	5.50	29.75
Dec. 19	2 boxes 216 oranges	4.00	8.00	
	2 " 210 tangerines	4.00	8.00	
	1 " grapefruit	3.75	3.75	
	½ " lemons	10.00	5.00	
	1 " grapes	4.00	4.00	
	1 " tomatoes	5.25	5.25	
	1 " bananas	5.50	5.50	
	12 sk 5# oranges	.25	3.00	
	12 " 8# "	.40	4.80	
	3 doz lettuce		6.25	53.55
Dec. 22	20 sk 8# oranges	.35	7.00	
	20 " 5# "	.25	5.00	
	2 box 88 apples	6.50	13.00	
	1 " 125 "	6.50	6.50	
	2 doz lettuce	2.00	4.00	
	1 box tomatoes	5.25	5.25	
	1 " 216 oranges	3.75	3.75	



JOHN VELLA & SONS

WHOLESALE

FRUIT AND PRODUCE

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P. O. BOX 43

DIAL 2-7028

Mobile, Alabama

Hardy's

page 2

Dec. 22, cont'd.	1 box 176 tangerines	@ 3.50	3.50	
	1 sk Ida potatoes	6.50	6.50	
	1 " Lg onions	4.50	4.50	
	2 boxes apples	6.50	<u>13.00</u>	72.00
Dec. 29,	2 doz lettuce	2.00	4.00	
	1 crt tomatoes	5.00	5.00	
	1 box apples	6.50	6.50	
	1 " grapes	3.50	3.50	
	1 sk Ida potatoes	6.50	<u>6.50</u>	25.50
Dec. 31,	1 box bananas	5.00	5.00	
	1 " tomatoes	5.25	5.25	
	2 doz lettuce	2.00	4.00	
	1 box oranges	3.75	3.75	
	1 " apples	6.50	6.50	
	1 " grapes	3.50	3.50	
	1 " bananas	5.00	<u>5.00</u>	33.00
Jan. 5, 1953	1 sk Ida potatoes	6.50	<u>6.50</u>	6.50
				<u>\$309.30</u>

STATE OF ALABAMA)
MOBILE COUNTY)

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

That the above and foregoing itemized statement
of account against Hardy's News Stand is true, correct,
justly due and unpaid.

Francis Vella

Sworn to and subscribed before me on
this the 9th day of February 1953.

W. R. Purney
Notary Public, Mobile County, Alabama.

SUMMONS AND COMPLAINT

RECORDED 701923
ORIGINAL

JOHN VELLA & SONS, A
Partnership, consisting of
John Vella, Jr. and
Francis Vella,
Plaintiff,

VS.

ERNESTINE HARDY, doing
business as Hardy's News
Stand,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED
FEB 13. 1953.
ANGE L. BUCK, Clerk

JAMES R. OWEN
ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA

Received in Sheriff's Office
this 14 day of Feb. 1953
TAYLOR WILKINS, Sheriff

Executed 2-14-53
by serving copy of within Summons and
Complaint on

Ernestine Hardy, doing
business as Hardy's
News Stand

Taylor Wilkins Sheriff
John Sellers Deputy Sheriff

JOHN VELLA & SONS, a
Partnership, consisting of
John Vella, Jr., Francis
Vella and Emma Vella,

Plaintiff,

vs

ERNESTINE HARDY, doing
business as Hardy's News Stand

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

Comes the defendant in the above styled cause and
answering plaintiff's bill of complaint says that the matters
therein alleged are untrue.

Ernestine Hardy
Defendant

1923

1923

RECORDED

FILED

3-14-23

ALICE J. DUCK, Clerk