

1958

T. J. DAVISON, SR., d/b/a  
People Market,

PLAINTIFF,

VS

SYBOL MADDOX,

Defendant.

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IN THE CIRCUIT COURT OF

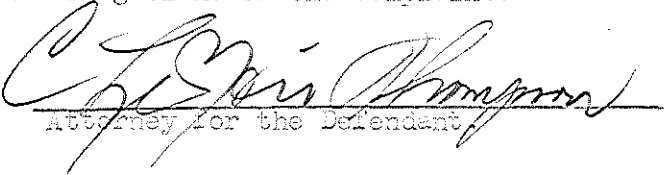
BALDWIN COUNTY, ALABAMA

AT LAW.

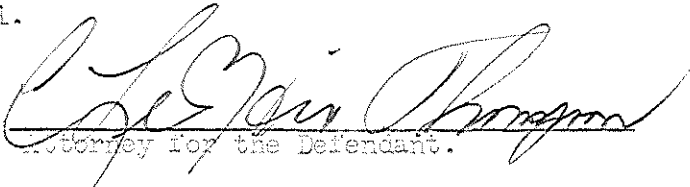
Comes the Defendant in the above styled cause and for answer to  
the complaint and says as follows:

1.

As to Count One, he denies the allegations of the complaint.

  
Attorney for the Defendant.

Defendant demands a Jury Trial.

  
Attorney for the Defendant.

1958 Jan

FILED

4-29-53  
ALICE J. DUCK, Clerk

STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon SYBOL MADDOX 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 T. J. DAVIDSON, SR., DOING BUSINESS AS PEOPLES MARKET.

WITNESS my hand this 3<sup>rd</sup> day of April, 1953.

  
Clerk

\* \* \* \* \*

T. J. DAVIDSON, SR., doing  
business as Peoples Market,  
Plaintiff,

VS.

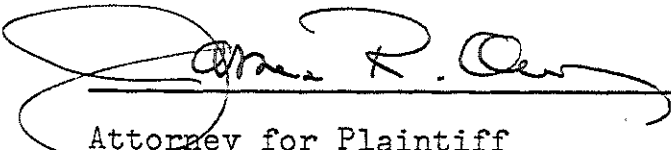
SYBOL MADDOX,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COMPLAINT

The Plaintiff claims of the Defendant the sum of Two Hundred Fifty-Four and 41/100 Dollars (\$254.41) due from the Defendant by Account on to-wit: November 30, 1951, 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 )  
\*  
BALDWIN COUNTY )

Before me, the undersigned authority within and for said County and State personally appeared T. J. Davidson, Sr., who after being by me first duly and legally sworn, deposes and says: That the attached itemized statement of account against Sybol Maddox is true, correct, justly due, and unpaid.

T. J. Davidson Sr

Sworn to and subscribed before me on  
this the 4<sup>th</sup> day of April, 1953.

James R. Owen

Notary Public, Baldwin County, Alabama

## EXHIBIT "A"

1951

AUGUST	11	Groceries	\$ 6.50
		Groceries	5.95
		Feed	5.70
		Potatoes	.35
	13	Turnips	.45
	14	Groceries	8.20
	18	Roast	3.35
		Onions	.19
	21	Groceries	6.15
	24	Cash	2.00
		Tomatoes	.52
		Meat	4.45
	27	Peaches	.35
		Milk of Magnesia	.50
	30	Groceries	8.12
	31	Groceries	8.94
SEPT.	7	Groceries	8.13
	12	Groceries	5.96
	13	Groceries	3.90
		Toothpaste	.12
	14	Groceries	15.02
	20	Groceries	4.01
	21	Groceries	4.96
	24	Groceries	19.13
	28	Groceries	6.42
OCT.	2	Groceries	7.18
	5	Groceries	9.90
	9	Groceries	10.09
	10	Groceries	1.19
	12	Groceries	5.01
	15	Groceries	6.12
	16	Groceries	3.00
	19	Groceries	13.35
	25	Groceries	4.50
	26	Groceries	14.14
	31	Bread	.32
		Listerine	.59
NOV.	2	Groceries	23.47
	21	Groceries	12.87
	30	Laying Mash	6.00
		TOTAL - - - -	\$247.10
		TAX - - - -	7.31
			\$254.41



ALABAMA

ATTORNEY AT LAW

JAMES R. OWEN

FILED

1953

AT LAW

BARBEN COUNTY, ALABAMA

IN THE CIRCUIT COURT OF

Defendant

SYBOL MADDOX

VS.

Plaintiff

People's Market

Doing business as

W. J. DAVIDSON, SR.

BY

TAYLOR WILKINS, Sheriff

BY SERVICE ON

ON

Received a copy of the within

on

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TAYLOR WILKINS, Sheriff

1953

COMPLAINT

T. J. DAVIDSON, doing business  
as PEOPLE'S MARKET,

VS.

SYBOL MADDOX,

Defendant,

BERNARD AND BYRD, INC., A  
Corporation,

Garnishee.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

STATE OF ALABAMA )

BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to notify Sybol Maddox that on  
the \_\_\_\_\_ day of January, 1954, a writ of garnishment in the  
above stated case was issued to Bernard and Byrd, Inc., a Corpora-  
tion, as garnishee.

Witness my hand this 29th day of January, 1954.

Alice J. Duck  
Clerk.

FILED

1-29-54

ALICE J. DUCK, Register