

1991

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon THELMA PIERCE 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 J. H. FAULKNER.

WITNESS my hand this 11th day of May, 1953.

David L. Smith
Clerk of the Circuit Court.

* * * * *

COMPLAINT

J. H. FAULKNER,)
Plaintiff,) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA
THELMA PIERCE,) AT LAW
Defendant.)

1. The plaintiff claims of the defendant the sum of Three Thousand Two Hundred One and 63/100 Dollars (\$3,201.63) damages for wrongfully taking the following goods and chattels of the property of the plaintiff:

Various cash and checks between the period of time commencing September 10, 1952 and ending October 2, 1952.

2. The plaintiff claims of the defendant the sum of Three Thousand Two Hundred One and 63/100 Dollars (\$3,201.63) damages for the conversion by her during the period of time between September 10, 1952 and October 2, 1952, of various cash and checks, the property of the plaintiff.

3. The plaintiff claims of the defendant the sum of Three Thousand Two Hundred One and 63/100 Dollars (\$3,201.63) for money received on October 2, 1952 by the defendant to the use of the plaintiff, which sum of money with interest thereon is still unpaid.

4. The plaintiff claims of the defendant the sum of Three Thousand Two Hundred One and 63/100 Dollars (\$3,201.63) due from her by account stated between the plaintiff and the defendant on, to-wit, the 2 day of October, 1952, which sum of money, with interest thereon, is still due and unpaid.

J. B. Black

Attorney for Plaintiff.

Miss 11 day of May 1953
TAYLOR WILKINS, Sheriff

SUMMONS AND COMPLAINT

J. H. FAULKNER,

Plaintiff,

VS.

THELMA PIERCE,

Defendant.

Received 12 day of May 1953

and on 12 day of May 1953

I served a copy of the within

on

By service on Thelma Pierce

TAYLOR WILKINS, Sheriff

By P. H. Duck D.S.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

MAY 11 1953

ALICE L. DUCK, Clerk

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