

SEARS, ROEBUCK AND COMPANY,
a corporation,

Plaintiff

-vs-

ELMER M. MARSHALL,

Defendant

:: IN THE CIRCUIT COURT OF

:: BALDWIN COUNTY, ALABAMA

:: NO. 2001

::

::

::

COUNT ONE

Plaintiff claims of the Defendant the sum of Sixty-Eight and 11/100 (\$68.11) Dollars, due from him by account on to-wit the 12th day of October, 1952, which sum of money with interest thereon is still due and unpaid.

COUNT TWO

Plaintiff claims of the Defendant Sixty-Eight and 11/100 (\$68.11) Dollars, for merchandise, goods, chattels sold by the Plaintiff to the Defendant, which sum of money with interest thereon is still due and unpaid.

John L. Moore

Attorney for Plaintiff

A verified statement of this account is attached hereto and forms a part thereof.

John L. Moore

Attorney for Plaintiff

Defendant's address:

P. O. Box 1489

Fairhope, Alabama

interpose' further

to the box 1700

defendant's evidence:

VERIFICATION FOR DEPOSITION

JOHN R. MOORE

and I am a duly sworn

I declare under oath that the foregoing is true and correct

VERIFICATION FOR DEPOSITION

JOHN R. MOORE

interpose' evidence to the fact that

the defendant is the owner of the property

(§ 86.11) defendant's property is located at 1700

defendant's property is located at 1700

COPIES TWO

interpose' evidence to the fact that

the fact that the defendant is the owner of the property

the fact that the defendant is the owner of the property

defendant's property is located at 1700

COPIES TWO

Defendant

JOHN R. MOORE

-12-

DEPOSITION

in connection with

JOHN R. MOORE AND COMPANY

DEPOSITION

IN THE CIRCUIT COURT OF

SEARS, ROEBUCK AND COMPANY, a corporation,	::	IN THE CIRCUIT COURT OF
	::	BALDWIN COUNTY, ALABAMA
Plaintiff	::	NO. <u>2001</u>
-vs-	::	
ELMER M. MARSHALL,	::	
Defendant	::	

COUNT ONE

Plaintiff claims of the Defendant the sum of Sixty-Eight and 11/100 (\$68.11) Dollars, due from him by account on to-wit the 12th day of October, 1952, which sum of money with interest thereon is still due and unpaid.

COUNT TWO

Plaintiff claims of the Defendant Sixty-Eight and 11/100 (\$68.11) Dollars, for merchandise, goods, chattels sold by the Plaintiff to the Defendant, which sum of money with interest thereon is still due and unpaid.

John L. Moore
Attorney for Plaintiff

A verified statement of this account is attached hereto and forms a part thereof.

FILED

5-23 1953

ALICE J. DUCK, Clerk

John L. Moore
Attorney for Plaintiff

Defendant's address:

P. O. Box 1489

Fairhope, Alabama

SEARS, ROEBUCK AND CO.

Local Address 51 So. Royal St.

City Mobile State Ala.

Date 5-19-53

BOOK 003 PAGE 384

Elmer M. Marshall
P.O. Box 1489
Fairhope, Ala.

KINDLY DETACH AND RETURN THIS COUPON WITH YOUR REMITTANCE

PURCHASE DATE	QUANTITY	MERCHANDISE	
		Balance	68.11
<p>Personally before me appeared D. B. Hinds, who after being duly sworn deposes and states that he is Credit Manager for Sears, Roebuck and Co., Mobile, Ala., that he is familiar with the accounts due said Company, that he has personal knowledge of the account described herein and that the foregoing balance is just, due and unpaid.</p> <p>Sears, Roebuck and Co. By <u>D. B. Hinds</u> Credit Manager</p> <p>Subscribed to and sworn to before me this <u>19th</u> day of <u>May</u> 19<u>53</u>.</p> <p><u>Mary Joe Jones</u> Notary Public <u>Mobile</u> County, State of <u>Ala.</u></p> <p>My commission expires <u>5/2</u> 19<u>54</u>.</p> <p>TERMS: CASH, NO DISCOUNT 10TH OF MONTH AFTER SHIPMENT</p>			

OUR PRICES ARE BASED UPON CASH TERMS. FOR THE CONVENIENCE OF CUSTOMERS WHO HAVE OPEN ACCOUNTS WITH US, A STATEMENT OF PURCHASES IS RENDERED ON THE FIRST OF EACH MONTH, PAYABLE ON OR BEFORE THE TENTH.

SEARS, ROEBUCK AND CO.
CREDIT DEPT.

PAID 19 CHECK NO.

CANCELED CHECK IS YOUR RECEIPT

Invoice

SEARS, ROEBUCK AND CO.

BOOK 003 PAGE 385

Local Address 51 So. Royal St.
City Mobile State Ala.

Date 5-19-53

Your Order No. _____

Elmer M. Marshall
P.O. Box 1489
Fairhope, Ala.

Our Acct. No. HNB946511

Terms: Cash 10th of month after
delivery — NO DISCOUNT

Kindly mention our account number when remitting or writing regarding this invoice

	Quantity	DESCRIPTION	Unit Price	Total Price
3-1-52	2	Tires	36.14	
		Tax	1.09	
			37.23	
		Dep.	4.00	
			33.23	
		C/C	3.30	
			36.53	36.53
3-26-52		Softline		
		plus tax	20.76	
		C/C	1.75	
			22.51	
		Dep.	4.00	
			18.51	18.51
4-7-52		Coupon Book	25.00	
		Dep.	5.00	
			20.00	
		C/C	1.75	
			21.75	21.75
6-9-52	1	Set Seat Covers	16.95	
		Tax	.51	
			17.46	
		Dep.	5.00	
			12.46	
		C/C	1.75	
			14.21	14.21
6-9-52		Softline		
		plus tax	6.28	
		C/C	.62	
			6.90	6.90
6-25-52		Softline		
		plus tax	11.11	
		C/C	1.10	
			12.21	

Invoice

SEARS, ROEBUCK AND CO.

BOOK 003 PAGE 386

Local Address 51 So. Royal St.
 City Mobile State Ala.

Date 5-19-53

Your Order No. _____

Elmer M. Marshall

Our Acct. No. HNB946511

Terms: Cash 10th of month after
 delivery — NO DISCOUNT

Kindly mention our account number when remitting or writing regarding this invoice

Quantity	DESCRIPTION	Unit Price	Total Price
	Con't		
	12.21		
	Dep. 2.00		
	<u>10.21</u>		10.21
			<u>108.11</u>
	Payments:		
	3-24-52 5.00		
	5-19-52 7.50		
	6- 3-52 7.50		
	7-17-52 10.00		
	9-12-52 <u>10.00</u>		
	<u>40.00</u>		<u>40.00</u>
	Balance-----		68.11

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SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2001.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Elmer M. Marshall

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against _____

Elmer M. Marshall, Defendant.....

by Sears, Roebuck & Company

_____, Plaintiff.....

Witness my hand this 23rd day of May 1953...

Livingston, Clerk

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2001 ----

----- TERM, 19 ----

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the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against _____

Elmer M. Marshall

_____, Defendant ----

by Sears, Roebuck & Company

_____, Plaintiff ----

Witness my hand this 25rd day of May 1953---

W. J. Smith _____, Clerk

No. _____ Page _____

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS and COMPLAINT

Filed 5-23, 1953

Reese H. Hume Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

, 19

, Sheriff

I have executed this summons

this, 19

by leaving a copy with

Sheriff

Deputy Sheriff

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2001

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Elmer M. Marshall

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in

the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Elmer M. Marshall

, Defendant.

by Sears, Roebuck & Company

, Plaintiff.

Witness my hand this 23rd day of May 1953

Alvin J. Nichols, Clerk

BOOK 003 PAGE 387

\$ 266.82

FOLEY, ALA., January 5,

195 2

FOR VALUE RECEIVED the undersigned jointly and severally promise to pay to the order of

HOME FINANCE

*****Two hundred sixty six and 82/100*****

DOLLARS

in 6 Mo. installments of \$ 44.47 each, and X installments of \$ X each, starting February 5, 195 2, and on the 5th., day of each consecutive month thereafter, until full amount is paid with interest of 8% per annum.

Payable at the office of said Home Finance, Foley, Ala.

THE PARTIES TO THIS INSTRUMENT, WHETHER MAKER, ENDORSER, SURETY, OR GUARANTOR, EACH FOR HIMSELF, HEREBY SEVERALLY WAIVE AS TO THIS DEBT, OR ANY RENEWAL THEREOF, ALL RIGHTS OF EXEMPTION UNDER CONSTITUTION AND LAWS OF ALABAMA, OR ANY OTHER STATE, AS TO PERSONAL PROPERTY, AND THEY EACH SEVERALLY AGREE TO PAY ALL COSTS OF COLLECTING OR SECURING OR ATTEMPTING TO COLLECT OR SECURE THIS NOTE, INCLUDING A REASONABLE ATTORNEY'S FEE WHETHER THE SAME BE COLLECTED OR SECURED BY SUIT OR OTHERWISE. AND THE MAKER, ENDORSER, SURETY OR GUARANTOR OF THIS NOTE SEVERALLY WAIVES DEMAND, PRESENTMENT, PROTEST, NOTICE OF PROTEST, SUIT AND ALL OTHER REQUIREMENTS NECESSARY TO HOLD THEM, AND THEY AGREE THAT TIME OF PAYMENT MAY BE EXTENDED WITHOUT NOTICE TO THEM OF SUCH EXTENSION.

WITNESS

Ollie H. Beck

L. S.

Gerallie I. Mader

L. S.

Perry W. Mader

L. S.

2017年12月29日 星期五

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