

SEARS ROEBUCK and COMPANY,
A CORPORATION

Plaintiff

VS.

JIM J. BROWN

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8912

1.

The Plaintiff claims of the Defendant the sum of TWO HUNDRED NINETY SEVEN and 17/100 DOLLARS (\$297.17), due from him by account on to-wit, the 14th day of October, 1968, which sum of money with interest thereon, is still unpaid.

2.

The Plaintiff claims of the Defendant the sum of TWO HUNDRED NINETY SEVEN and 17/100 DOLLARS (\$297.17), due on account stated between the Plaintiff and Defendant on the 14th day of October, 1968, which sum of money with the interest thereon, is still unpaid.

3.

The Plaintiff claims of the Defendant the sum of TWO HUNDRED NINETY SEVEN and 17/100 DOLLARS (\$297.17), due from him by account on, to-wit, October 14, 1968, which sum of money with the interest thereon is still 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.

WILTERS, BRANTLEY & NESBIT

BY:

Phyllis S. Nesbit
Attorney for Plaintiff

FILED

OCT 2 1969

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JIM J. BROWN

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.....

JIM J. BROWN, Defendant.....

by SEARS ROEBUCK AND COMPANY, A CORPORATION

Plaintiff.....

Witness my hand this 2 day of Oct 19 69

Elise J. Duet, Clerk

ef/
10-2-69

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Sears Roebuck & Company,

a Corporation

Plaintiffs

vs.

Jim J. Brown

Defendants

SUMMONS AND COMPLAINT

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Filed 19.....

OCT 2 1969

Clerk

ALICE J. DUCK

CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

BY:

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Whitehouse Forks just beyond
the School, Rural Route 1,
Box 210, Bay Minette, Ala.

Received In Office

RECEIVED

OCT 2 1969

19.....

Sheriff

I have executed this summons

this

OCT 2 1969

19.....

by leaving a copy with

Jim J. Brown

Taylor Wilkins Sheriff

W. A. Zolner Deputy Sheriff

Sears

SEARS, ROEBUCK AND CO.

Sept. 29, 1969

Personally before me appeared E.A. Daigle who after being duly sworn, deposes and states that he is Assistant Credit Manager for SEARS, ROEBUCK AND CO., Mobile, Ala., that Mobile Store handles the Bay Minette Store credit Accounts, that he is familiar with the accounts due said Company, that he has personal knowledge of the account of Jim J. Brown, Rt 1 Box 210 Bay Minette, Ala., that \$297.17 is the accurate, due and unpaid balance of Jim J Brown.

BY

E.A. Daigle
Assistant Credit Manager
SEARS, ROEBUCK AND CO.

SUBSCRIBED TO AND SWORN TO BEFORE ME THIS 29th DAY
OF Sept 19 69.

Mary G. Lee
NOTARY PUBLIC

Mobile COUNTY, STATE OF *Ala.*

MY COMMISSION EXPIRES

2/9 19 *70*

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thank you for shopping at Sears