

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
CASE NUMBER 8966

PLEA

Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause says:

1. The allegations of the complaint are untrue.

Attorney for Defendant

FILED
NOV 19 1969
ALICE J. DUCK
CLERK
REGISTER

FILED

NOV 19 1969

ALICE J. DUCK
CLERK
REGISTER

GOLD PLATE FOODS, INC.,
a corporation

Plaintiff,

-VS-

CLEDIS PETERSON, d/b/a
PETERSON PRODUCE COMPANY,

Defendant.

CIRCUIT COURT
IN THE ~~COUNT OF~~
~~XXXXXX~~ ~~SESSIONS OF~~ OF
BALDWIN
~~XXXXXX~~ COUNTY, ALABAMA

CASE NUMBER: 8966

The Plaintiff claims of the Defendant SEVEN
HUNDRED FORTY-ONE AND 16/100 (\$ 741.16)
DOLLARS, due from him by account, which sum of money,
together with 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.

ENGEL AND SMITH,
Attorneys for Plaintiff

BY: Desmond B. Tolson
MEMBER APPEARING

DEFENDANT MAY BE SERVED AT:
Loxley, Alabama

FILED

NOV 1 1969

ALICE J. DUCK CLERK
REGISTER

EXHIBIT "A"

STATE OF ALABAMA)

COUNTY OF MOBILE)

Before me, the undersigned authority in and for
said State in said County, personally appeared _____
_____CARL M. WILSON_____, who is known to me,
and known to be _____Secretary_____ of
_____Gold Plate Foods, Inc._____, and who, having
been first duly sworn, deposes and says upon his oath that
he has personal knowledge of the itemized account hereto,
that the same is true and correct, and that no part of
same has been paid.

Carl M. Wilson
AFFIANT

Subscribed and sworn to and

before me on this the 31st

day of October,

19 69.

Barbara E. Thompson
NOTARY PUBLIC, ALABAMA STATE AT LARGE

My Commission Expires Aug. 15, 1972

FILED

NOV 1 1969

ALICE J. DUCK CLERK
REGISTER

FGEX 55420

Invoice

STATEMENT

copy

Gold Plate Foods Company

Processor - Shipper - Broker

P. O. Box 411

Phone 205-943-5661

FOLEY, ALABAMA 36535

June 17 1968

Peterson Produce Co.

DATE	INVOICE NO.	DESCRIPTION	UNIT PRICE	AMOUNT
		396 50# No 1 US red	1.67 1/2	663.30
		504 50# No. 1 white	2.00	1,008.00
				1,671.30
		he paid \$930.14 on this and claims the rest of the potatoes spoiled -		

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8966

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CLEDIS PETERSON, d/b/a PETERSON PRODUCE COMPANY

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.....

Cledis Peterson, d/b/a Peterson Produce Company..... Defendant.....

by Gold Plate Foods, Inc., a corp.

..... Plaintiff.....

Witness my hand this 1st day of November 1969...

Alice J. Luck Clerk

24-10-13-69

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

GOLD PLATE FOODS, INC., A CORP.,

Plaintiffs

vs.

CLEDIS PETERSON, d/b/a PETERSON
PRODUCE COMPANY

Defendants

SUMMONS AND COMPLAINT

Filed ... November 1, 1969

Alice J. Duck Clerk

ENGEL & SMITH

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

NOV 3 1969

19.....

Sheriff

I have executed this summons

this 13th Nov 1969
by leaving a copy with

Cledis Peterson

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY Brown
DEPUTY SHERIFF

Taylor Wilkins, Sheriff

H. Brown Deputy Sheriff

40 mile R.T.
Lorphy