

2043

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STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT — IN LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Daniel J. Vinson 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 the same, then and there to answer the complaint of J. Fred Thrasher, doing business as Thrasher-Brown Service Funeral Home.

Witness my hand, this 21st day of July, 1953.

Alice J. Welch
Clerk

J. FRED THRASHER, DOING BUSINESS AS)
THRASHER-BROWN SERVICE FUNERAL HOME)

PLAINTIFF

V.

DANIEL J. VINSON

DEFENDANT

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN LAW NO. _____.

I

The plaintiff claims of the defendant Two hundred and Eleven dollars and fifteen cents(\$211.15), due from him by account on the 26th day of December, 1952, which sum of money with interest thereon is still unpaid.

II

The plaintiff claims of the defendant Two hundred and Eleven dollars and fifteen cents(\$211.15), due from him on account stated between the plaintiff and the defendant on the 1st day of January, 1953, which sum of money with interest thereon is still unpaid.

III

The plaintiff claims of the defendant Two hundred and Eleven dollars and fifteen cents(\$211.15), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on the 26th day of December, 1952, which sum of money with interest thereon is still unpaid.

E. J. Connor Rivers, Jr.
Attorney for Plaintiff

This account is verified
by affidavit attached hereto
and made a part of this complaint.

E. J. Connor Rivers, Jr.

FILED

7-21-54

ALICE J. DUCK, Clerk

--AFFIDAVIT--

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STATE OF ALABAMA)
)
BALDWIN COUNTY) SS.

In the city of Bay Minette, Baldwin County, Alabama, came J. Fred Thrasher and made oath and says that he is the proprietor and is authorized to make this statement, and that he is familiar with the books and accounts of the Thrasher-Brown Service Home and that Daniel J. Vinson is justly and duly indebted to the said J. Fred Thrasher in the sum of Two hundred and Eleven dollars and fifteen cents (\$211.15).

Now due and unpaid upon account, the sum herein before last mentioned from Daniel J. Vinson to the said J. Fred Thrasher.

J. Fred Thrasher
J. Fred Thrasher

Subscribed and sworn to before me this 21 day of July, 1953.

E. E. Garner
Notary Public

J. B.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 7-243

J. FRED THRASHER, d/b/a

THRASHER-BROWN SERVICE FUNERAL
HOME,

PLAINTIFF

VS.

DANIEL J. VINSON,

DEFENDANT

SUMMONS AND COMPLAINT

FILED 7-21-53

Alice M. Murrell
CLERK

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

Received in Sheriff's Office
this 24 day of July, 1953
TAYLOR WILKINS, Sheriff

Received _____ day of _____ 19____
and on 27 day of Aug 1953
I served a copy of the within _____
on _____
By service on Daniel J. Vinson
TAYLOR WILKINS, Sheriff
By Taylor Wilkins