

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, - GREETING:

YOU ARE HEREBY COMMANDED to summon VIRGIL V. RHODES, JR. d/b/a RHODES DAIRY, 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, Alabama, at Bay Minette, against VIRGIL V. RHODES, JR. d/b/a RHODES DAIRY, by the REGAN COMPANY.

WITNESS my hand this the 15th day of July, 1953.

Archie. [Signature]
Clerk

COMPLAINT

THE REGAN COMPANY,)
Plaintiff)
vs.) IN THE CIRCUIT COURT OF
VIRGIL V. RHODES, JR. d/b/a)
RHODES DAIRY,) BALDWIN COUNTY, ALABAMA
Defendant) AT LAW

COUNT I:

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED SEVENTY-EIGHT & 75/100 DOLLARS (\$778.75), together with interest thereon, due from him by account on, to wit: January 7, 1953, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED SEVENTY-EIGHT & 75/100 DOLLARS (\$778.75), together with interest thereon, due from him on account stated between the Plaintiff and the Defendant on, to wit: January 7, 1953, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED SEVENTY-EIGHT & 75/100 DOLLARS (\$778.75), together with interest thereon, due from him for merchandise, goods, and chattels sold by the Plaintiff to the Defendant on, to wit: January 7, 1953, which sum of money, with interest thereon, is still unpaid.

[Signature]
Attorney for Plaintiff

The Defendant lives at Bay Minette, Ala.

There is attached hereto and made a part thereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a Notary Public, which shows the amount due on this account as of the 7th day of January, 1953.

[Signature]

THE STATE OF ALABAMA,)
MOBILE COUNTY.)

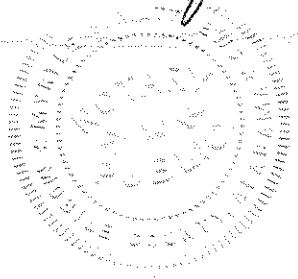
W. C. REGAN, first being duly sworn, deposes and says as follows:

That he is the Credit Manager of THE REGAN COMPANY, and that he is duly authorized to make this affidavit; - that the annexed statement of account is taken from the original books of entry of the company and that upon information and belief, the balance of \$778.75 shown due is correct; that the said balance with interest thereon is justly due and owing to the REGAN COMPANY from VIRGIL V. RHODES, JR. d/b/a RHODES DIARY, that no payments have been made thereon, except as set forth in the annexed statement, and that there are no offsets or counterclaims against the same to the best of your deponent's knowledge and belief.

Sworn to before me this 21st
day of July, 1953.

W C Regan

Myrtle S. Matthews
Notary Public, Mobile County, Ala.



STATEMENT

MOBILE, ALA.,

19

M

Rhodes Dairy
Bay Minette, Ala.

IN ACCOUNT WITH

REGAN COMPANY

1751 OLD SHELL RD.

TEL. 6-6914

Dec	31	1948 - Balance	983 07	
Jan	11	49		298 64
	18		102 25	
	19		38 40	
	25		234 04	
	25			257 50
Feb	1		36 04	
	4		12 85	
	10		76 80	
	10			426 93
Mar	7		81 60	
	8		76 80	
	17		38 40	
	21		76 80	
	25			374 69
	31		76 80	
Apr	12		76 80	
	21		98 40	
	25		15 33	
	26		61 44	
	29		75	
May	13			350 40

MOBILE, ALA.,

19

M

Rhodes Dairy

Bay Minette, Ala

IN ACCOUNT WITH

REGAN COMPANY

1751 OLD SHELL RD.

TEL. 6-6914

May	23		23501 ✓	
June	7		6553 ✓	
	16		19200 ✓	
	18			3074
	24		3286 ✓	
July	14		2857 ✓	
	18			9792
	21		2529 ✓	
	22		24480 ✓	
	27		7713 ✓	
Aug	2		1820 ✓	
	8		394 ✓	
	16			16416
Sept	1		7042 ✓	
	23		22848 ✓	
Nov	15			10000
Feb	13	1950	119 ✓	
	13			119
	28		11497 ✓	
Mar	3			11497
	13		8317 ✓	
	16			8317

MOBILE, ALA.,

19

M R Lados Dairy
Bay Minette, Ala

IN ACCOUNT WITH

REGAN COMPANY

1751 OLD SHELL RD.

TEL 6-6914

Mar	25		37 50 ✓	
	31		5 31 ✓	
Apr	5			37 50
	15			5 31
	17		63 84 ✓	
	24			63 84
May	5		75 93 ✓	
	31	C/M		10 00
Jun	13			40 31
Aug	10			35 62 ✓
	10			50 00
Oct	6		175 00 ✓	
	13			175 00
	26		44 56 ✓	
Nov	6			44 56
	6		140 00 ✓	
	6		55 33 ✓	
	14			195 33
	29		35 00 ✓	
Dec	5			35 00
	15		33 00 ✓	
	17			33 00

MOBILE, ALA., 19

M Rhodes Dairy
Bay Minette, Ala.

IN ACCOUNT WITH

REGAN COMPANY

1751 OLD SHELL RD.

TEL. 6-6914

	19			50 00
Jan	29	1951	31 01	
Feb	13			31 01
	16		4 10	
	23			4 10
Mar	30	C/M		18 63
May	11			21 83
Nov	6			43 11
Feb	12	1952		50 00
Mar	22			25 00
May	19		17 89	
	29			17 89
	20		33 75	
	27		7 88	
	29			25 00
Jan	9		6 18	
	12	C/M		33 75
Jul	2		30 1	
Oct	6			50 00
Jan	7	1953 C/M		14 01
			778 75	

RECORDED

MS 9047

THE REGAN COMPANY,

Plaintiff

VS.

VIRGIL V. RHODES, JR., d/b/a
RHODES DIARY,

Defendant

SUMMONS

IN THE CIRCUIT COURT OF BALTIMORE

COUNTY, ALABAMA, AT LAW

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

4 West 17-25-53
Missy Smith

July 33

Received _____ day of _____ 19____
and on 27 day of July 1953
I served a copy of the within _____
on _____

By service on Virgil V. Rhodes

TAYLOR WILKINS, Sheriff
By Robert Allen D.S.