

2261

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons WILMER TAYLOR 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 HERBERT ENGLAND, doing business as H. ENGLAND LUMBER CO., Roberts-  
dale, Alabama.

Witness my hand this the 17<sup>th</sup> day of May, 1954.

Willie J. Adams  
Clerk

HERBERT ENGLAND, DOING BUSINESS  
AS H. ENGLAND LUMBER CO.,  
ROBERTSDALE, ALABAMA,  
Plaintiff

vs

WILMER TAYLOR,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. \_\_\_\_\_

COUNT ONE: The Plaintiff claims of the Defendant the sum of Two Hundred Ninety-nine Dollars (\$299.03) Three Cents due by the Defendant to the Plaintiff on open account on, to-wit, the 17th day of November, 1953, which said sum of money together with the interest thereon is still due and unpaid.

COUNT TWO: The Plaintiff claims of the Defendant the sum of Two Hundred Ninety-nine Dollars and Three Cents (\$299.03) due by the Defendant to the Plaintiff on account stated on to-wit, the 17th day of November, 1953, which said sum of money together with the interest thereon is still due and unpaid.

COUNT THREE: The Plaintiff claims of the Defendant the sum of Two Hundred Ninety-nine Dollars and Three Cents (\$299.03) due by the Defendant to the Plaintiff for goods, wares and merchandise sold by the Plaintiff to the Defendant from on, to-wit, August 14, 1953 to November 17, 1953, which said sum of money together with the interest thereon is still due and unpaid.

James C. Hendrix  
Attorney for Plaintiff

2261  
Wilmer Taylor  
Montrose, Ala.

State of Alabama  
Baldwin County

Before me Grady R. Gilbert Jr., Notary Public  
in and for county said state personally appear-  
ed Ora Lee Zajicek who being by me first duly  
sworn on her oath does depose and say as follows:  
That she is the bookkeeper of H. England Lumber  
Co. and that the verified statement of the  
account of Wilmer Taylor was setoff here in above,  
is true and correct statement of his account and  
that there is now due on said account the sum of  
\$299.03 after allowing the defendant said Wilmer  
Taylor all just credits or setoff to which he  
may be entitled.

Ora Lee Zajicek  
Bookkeeper

Sworn to and subscribed before me on this 16  
day of August, 1954

Grady R. Gilbert Jr.  
Notary Public Baldwin County

No. \_\_\_\_\_ Page \_\_\_\_\_

The State of Alabama

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed \_\_\_\_\_ 19\_\_\_\_

\_\_\_\_\_. Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

\_\_\_\_\_. 19\_\_\_\_

I have executed this summons

this \_\_\_\_\_ 19\_\_\_\_

by leaving a copy with

\_\_\_\_\_. Deputy