

SUMMONS AND COMPLAINT

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon A. L. QUINLEY to appear within thirty days from the service of this writ in the Circuit Court to be held for the said County at the place of holding the same, then and there to answer the complaint of PEOPLES FERTILIZER COMPANY, A Corporation.

Witness my hand, this 9th day of June, 1953.

Amos L. Brantley
Clerk

PEOPLES FERTILIZER COMPANY, A Corporation

Plaintiff,

VS.

A. L. QUINLEY,

Defendant.

IN THE CIRCUIT COURT IN
BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. 2512.

The Plaintiff claim of the Defendant the sum of SIX HUNDRED and 52/100 (\$600.52) DOLLARS due from him by account on, to-wit, the 1st. day of April, 1953, 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 hereto attached as Exhibit A and made a part hereof.

WILTERS & BRANTLEY

BY:

Albert M Brantley
Attorneys for Plaintiff

April 1,

1953

Mr. A. L. Quinley

Bay Minette, Alabama.

IN ACCOUNT WITH

**PEOPLES FERTILIZER CO.
HIGH GRADE FERTILIZER**

FOLEY, ALA.

PHONE 70

	Statement rendered		\$547	55
Interest at 6% to 4/1/53			52	07
Balance due			\$600	52
STATE OF ALABAMA				
BALDWIN COUNTY				
Re it remembered, that on this 1 day of April, 1953, personally appeared before me, the undersigned authority, <i>R. O. Evers</i> , known to me who being duly sworn upon his oath that he is the <i>President</i> of Peoples Fertilizer Co., a corporation organized and doing business under the laws of the State of Alabama and has been duly authorized by said corporation to make this affidavit. That he is familiar with the books and business of said Peoples Fertilizer Co., Inc.; that the above account against A. L. Quinley of Bay Minette, Alabama, is just and correct, within the knowledge of this affiant, that credit has been duly given for all payments and just and lawful offsets to which the said account is entitled as thereon stated, and that the balance thereof, amounting to the sum of SIX HUNDRED AND 52/100 (\$600.52) DOLLARS with interest from April 1, 1953, is justly due and remains unpaid.				
		<i>R. O. Evers</i>		
		Affiant		
I hereby certify under my official seal that I am authorized as a <i>Notary Public</i> to administer oaths under the laws of the State of Alabama and that the foregoing was subscribed and sworn to before me on the day and year first above stated.				
		<i>J. W. Crosby</i>		
		Official		

Received in Sheriff's Office
this 9 day of June 1953
TAYLOR WILKINS, Sheriff

NO 2012

PEOPLES FERTILIZER COMPANY, a
Corporation,

PLAINTIFF

VS

A. L. QUINLEY,

DEFENDANT.

Summons and Complaint

Received 11 day of June 1953
and on 11 day of June 1953
I served a copy of the within
on _____

By service on A. L. Quinley
TAYLOR WILKINS, Sheriff
By Patricia Bell D.S.

FILED
JUN 9 1953
ALICE J. DUCK, Clerk

2012