

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

June 22, 1970

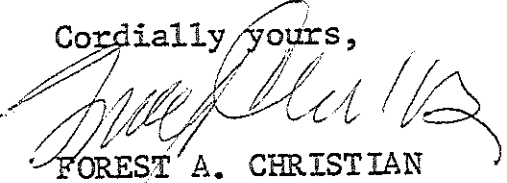
Hon. Telfair Mashburn
Judge of Circuit Court
Bay Minette, Alabama

Re: Higgins Mortuary, Inc.
Vs: Emmett Sanderlin
Case No. 9226

Dear Judge Mashburn:

Kindly render a judgment on this account based on a sworn to itemized statement of account on which there is a principal balance due of \$491.00, plus interest of \$22.00 for a total of \$513.00, which is rounded to \$500.00.

Cordially yours,



FOREST A. CHRISTIAN

SUMMONS

STATE OF ALABAMA,)

COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons EMMETT SANDERLIN, 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 the place of holding same by HIGGINS MORTUARY, INC.

Witness my hand this the 22 day of April, 1970.

Alice J. Duck
Clerk

** ** *

COMPLAINT

HIGGINS MORTUARY, INC.,	X	
PLAINTIFF,	X	IN THE CIRCUIT COURT OF
VS:	X	BALDWIN COUNTY, ALABAMA
EMMETT SANDERLIN,	X	AT LAW
DEFENDANT.	X	70,9226

COUNT I:

The Plaintiff claims of the Defendant FOUR HUNDRED NINETY-ONE & 00/100 DOLLARS (\$491.00), due from him by account on, to wit: the 23rd day of September, 1969, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant FOUR HUNDRED NINETY-ONE & 00/100 DOLLARS (\$491.00), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 23rd day of September, 1969, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant FOUR HUNDRED NINETY-ONE & 00/100 DOLLARS (\$491.00), due from him for merchandise, goods and chattels sold by the Plaintiff to Defendant on, to wit: the 23rd day of September, 1969, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, 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 20th day of April, 1970.

Defendant's address:
Route 3
Foley, Alabama 36535

Forest A. Christian
Forest A. Christian, Attorney for
Plaintiff

FILED

APR 22 1970

MAILING ADDRESS
P. O. BOX 534
FOLEY, ALABAMA 36535

STATEMENT

TEL: 943-2391

HIGGINS MORTUARY, INC.
"For Those Who Care"

TO: Mr. Emmett Sanderlin
Route 3
Foley, Alabama 36535

DATE April 6, 1970

Charges in connection with the funeral and burial
of Mrs. Virginia L. Sanderlin. Date of Death 5/14/68

CASKET AND SERVICES-----	\$ 459.00
WILBERT BURIAL VAULT-----	225.00
USE OF FLOWER CAR-----	15.00
ZADES BEAUTY SHOP----- (FIXING HAIR)-----	5.00
MRS. JOE FULLFORD (ORGANIST)-----	5.00
OPENING AND CLOSING OF GRAVE-----	35.00
TWO CERTIFIED COPIES OF DEATH CERT.-----	2.00
	<u>\$ 746.00</u>
PAYMENT 5/12/68 BY MRS. FRANCES KANTROW-----	-225.00
BALANCE-----	\$ 521.00
Payment 9-23-69 by Emmett Sanderlin-----	30.00
BALANCE-----	<u>\$ 491.00</u>

AFFIDAVIT

STATE OF ALABAMA)

COUNTY OF BALDWIN)

Before me, the undersigned authority in and for aforesaid County and State, who is a Notary Public under my seal of office, which seal of office is hereto attached, personally appeared J. F. BISCHOFF, known to me, who being duly sworn upon his oath stated that he is the manager of HIGGINS MORTUARY, INC. officer Company, organized and doing business under the laws of the State of Alabama, that as such he makes this affidavit, that he is familiar with the books and business of HIGGINS MORTUARY, INC., that the attached account against EMMETT SANDERLIN is just and correct, within the knowledge of the affidavit, that he has authority to make this affidavit and that he has personal knowledge of the matters contained herein, that the items thereon stated composing the said account, were sold and delivered to the above mentioned debtor at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which said debtor is entitled as thereon stated, and that the balance thereof, amounting to the sum of \$491.00 with interest from 9-23-69, is justly due and remains unpaid. HIGGINS MORTUARY, INC.

BY: J. F. Bischoff

Affiant

J. F. BISCHOFF, manager

Sworn to, subscribed, acknowledged, signed and sealed before me as a Notary Public under my seal of office, with my seal hereto affixed on this the 20th day of April, 1970.

Affix Seal:

Ruth Hellingworth
Notary Public

My Commission Expires: Mar. 2, 1974



LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA 36535

Received 22 day of April 19 70
and on 13 day of May 19 71
I served a copy of this within SLC
on Emmett Sanderlin

By service on _____

TAYLOR WILKINS, Sheriff

By Walter Christian, S.

Sheriff claims 16 miles of
Ten Cents per mile Total \$ 1.60
TAYLOR WILKINS, Sheriff
J. Wilkins
DEPUTY SHERIFF

84

70. 7226
SUMMONS AND COMPLAINT

HIGGINS MORTUARY, INC.,

PLAINTIFF,

VS:

EMMETT SANDERLIN,

DEFENDANT.

FILED

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ALICE J. DUCK CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN

(205) 943-2201

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