

LANGSTON BAG CO.,
A Corporation,

Plaintiff,

vs.

DOUGLAS D. RHODES,

Defendant.

)
) IN THE CIRCUIT COURT OF

)
) BALDWIN COUNTY, ALABAMA

)
) AT LAW.

)
) 9493

COUNT ONE:

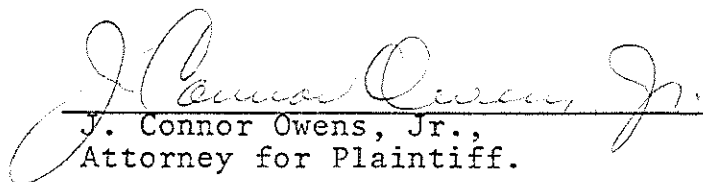
The Plaintiff claims of the Defendant the sum of SIX THOUSAND ONE HUNDRED EIGHTY FOUR AND 26/100 DOLLARS (\$6,184.26), together with the interest thereon, the balance due by account by and between the Plaintiff and the Defendant on, to-wit, August 1, 1970, which sum of money, together with the interest thereon, is still due and unpaid.

COUNT TWO:

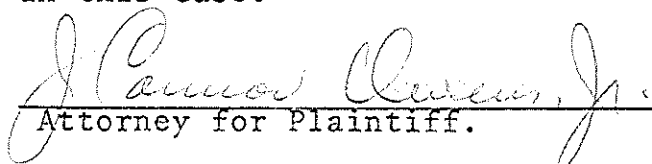
The Plaintiff claims of the Defendant the sum of SIX THOUSAND ONE HUNDRED EIGHTY FOUR AND 26/100 DOLLARS (\$6,184.26), together with the interest thereon, the balance due by account stated by and between the Plaintiff and the Defendant on, to-wit, August 1, 1970, which sum of money, together with the interest thereon, is still due and unpaid.

COUNT THREE:

The Plaintiff claims of the Defendant the sum of SIX THOUSAND ONE HUNDRED EIGHTY FOUR AND 26/100 DOLLARS (\$6,184.26), together with the interest thereon, the balance due by the Defendant to the Plaintiff, for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, June 15, 1970, and on divers occasions prior thereto, which sum of money, together with the interest thereon, is still due and unpaid.


J. Connor Owens, Jr.,
Attorney for Plaintiff.

The account sue for in this cause is verified by affidavit attached to the complaint in this case.


Attorney for Plaintiff.

STATE OF TENNESSEE

COUNTY OF SHELBY

)
(
)

Before me, the undersigned authority within and for said State and County, personally appeared George Britton who, first being duly sworn, deposes and says as follows:

That he is Treasurer, of Langston Bag Co., a corporation, and is familiar with the books and accounts of said corporation; that Douglas D. Rhodes, Baldwin County, Alabama, is justly indebted to Langston Bag Co. in the sum of \$6,184.26, and that said amount is due and unpaid; further, there are no set-offs or counterclaims due said indebtedness.

LANGSTON BAG CO.,
A Corporation.

By:

George Britton - Treas.

Sworn to and subscribed before me
this 21st day of September, 1970.

Francis E. Carpenter
Notary Public, Shelby County, Tennessee.

My Commission Expires Jan. 23, 1973.

FILED

SEP 22 1970

ALICE J. DUCK

CLERK
REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon DOUGLAS D. RHODES
FOLEY, ALABAMA

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, State of Alabama, at Bay Minette against.....
DOUGLAS D. RHODES

..... Defendant.....

by LANGSTON BAG CO., a corporation

..... Plaintiff.....

Witness my hand this 22nd day of September 19 70

Alice J. Black, Clerk

No. 9493

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT

LANGSTON BAG CO., a
 corporation
 Plaintiffs

vs.

DOUGLAS D. RHODES
 Defendants

SUMMONS AND COMPLAINT

Filed **FILED** SEPTEMBER 22 1970
 SEP 22 1970
 Clerk

ALICE J. DUCK CLERK
 REGISTER

J. CONNOR OWENS, JR.,
 Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

FOLEY, ALABAMA

Recieved In Office

Sept 22 1970

Taylor Wilkins Sheriff

I have executed this summons

this 31 Oct 1970

by leaving a copy with

Douglas D. Rhodes

Sheriff claims 72 miles

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

DEPUTY SHERIFF

Taylor Wilkins Sheriff

Deputy Sheriff