

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Virgil V. Rhodes, Jr., 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 J. L. Mothershead, doing business as J. L. Mothershead Oil Company.

WITNESS my hand this 11th day of August, 1971.

Ernie B. Blackmon
Clerk

The address of the defendant is Bay Minette, Alabama.

J. L. MOTHERSHEAD, doing)
business as J. L. Mothershead)
Oil Company,)
Plaintiff,)
VS.)
VIRGIL V. RHODES, JR.,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

9984

C O M P L A I N T

COUNT ONE

The plaintiff claims of the defendant Four Hundred Twenty and 82/100 Dollars (\$420.82) due from him by account on the 1st day of June, 1971, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO

The plaintiff claims of the defendant Two Hundred Thirty and 09/100 Dollars (\$230.09) due from him by account on the 1st day of June, 1971, which sum of money, with the interest thereon, is still unpaid.

COUNT THREE

The plaintiff claims of the defendant Eighty-nine and 44/100 Dollars (\$89.44) due by check drawn by the defendant on

April 14, 1971, which check was duly presented for payment by the plaintiff and returned to plaintiff for "Insufficient Funds", together with interest thereon. Plaintiff avers that he is the holder of the said worthless check for the payment of money and further avers that the said check was unlawfully made, uttered, or delivered to him by the defendant, Virgil V. Rhodes, Jr. Plaintiff claims the further sum of \$15.00 as a reasonable attorney's fee in this cause and in accordance with Title 7, Section 131(1) of the Code of Alabama.

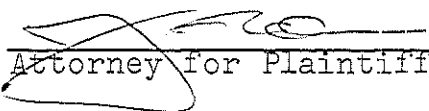
COUNT FOUR

The plaintiff claims of the defendant Eighty-one and 04/100 Dollars (\$81.04) due by check drawn by the defendant on February 13, 1971, which check was duly presented for payment by the plaintiff and returned to plaintiff for "Insufficient Funds", together with interest thereon. Plaintiff avers that he is the holder of the said worthless check for the payment of money and further avers that the said check was unlawfully made, uttered, or delivered to him by the defendant, Virgil V. Rhodes, Jr. Plaintiff claims the further sum of \$15.00 as a reasonable attorney's fee in this cause and in accordance with Title 7, Section 131(1) of the Code of Alabama.

FILED

AUG 11 1971

EUNICE B. BLACKMON CIRCUIT
CLERK


Attorney for Plaintiff

9984

J. L. Mothershead
d/b/a: J. L. Mothershead
Det. Co.

vs.

Virgil V. Rhodes, Jr.

FILED

AUG 11 1971

EUNICE B. BLACKMON
CIRCUIT CLERK

AUG 12 1971

TAYLOR WILKINS
SHERIFF

James R. Owen
ATTY-

Sheriff claims _____ miles at
Ten Cents per mile Total \$ _____
TAYLOR WILKINS, Sheriff
BY _____
DEPUTY SHERIFF

Received 12 day of Aug 1971
and on 24 day of Aug 1971
I served a copy of the within letter
on Virgil V. Rhodes
By service on _____

TAYLOR WILKINS, Sheriff
BY W. D. Black D.S.