

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

December 10, 1971

Hon. Telfair Mashburn
Judge of Circuit Court
Bay Minette, Alabama 36507

Re: House of Pfaff, Inc.

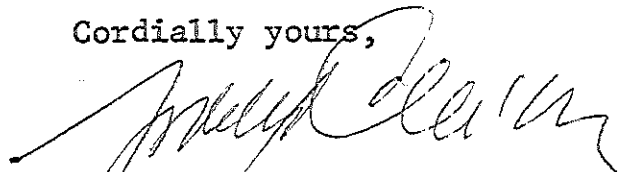
Vs: Todd Memorials

Case No. 10,037

Dear Judge:

Kindly render a judgment in this case based on a sworn-to itemized statement of account in the amount of \$112.34, principal, without interest.

Cordially yours,



FOREST A. CHRISTIAN

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon TODD MEMORIALS 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 HOUSE OF PFAFF, INC.

Witness my hand this the 23 day of Sept.

Eunice B. Blackmon
Clerk

CCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCC

COMPLAINT

HOUSE OF PFAFF, INC.

PLAINTIFF

VS:

TODD MEMORIALS

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW 70,037

COUNT I:

The plaintiff claims of the defendant ONE HUNDRED, TWELVE DOLLARS & 34/100 (\$112.34), due from him by account on, to wit: the 5th day of November, 1970, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE HUNDRED, TWELVE DOLLARS & 34/100 (\$112.34), due from him on account stated between the plaintiff and the defendant on, to wit: the 5th day of November, 1970, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE HUNDRED, TWELVE DOLLARS & 34/100 (\$112.34), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 5th day of November, 1970, 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 8th day of September, 1971.

Malcolm C. (Att)
Attorney for Plaintiff

The Defendant's address is:

Box 802
Highway 31 South
Bay Minette, Alabama

FILED

SEP 23 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

SAND
BLAST
ROCK DRILLS
SUPPLIES

ELBERTON OFFICE
TELEPHONE
404-283-4351

9/7/71

TERMS: 30 Days Net

PLEASE NOTIFY OFFICE PROMPTLY IF INCORRECT - THANK YOU!

County of Queens } SS:
State of New York }

Before me, _____ a Notary Public duly commissioned and sworn in
Notary Public
and for the above state and county, this day personally appeared George Pfaff, Jr.
Name of Officer
to me well known, who being by me first duly sworn says that:

*1. He is an individual trading as _____

*2. That he and _____
are partners trading as _____

*3. That he is Vice President of House of Pfaff, Inc.
Title Name of Creditor
of Long Island City, N.Y. a corporation incorporated under the laws of the State of Georgia
City and State Address

and that the foregoing account in favor of House of Pfaff, Inc. Creditor
and against Todd Memorials Debtor

showing a balance and amount due of 112.34 Amount
with _____ interest from the _____ day of _____ 19 _____

until paid, is within his knowledge just, true and correct; that it is justly and truly due and unpaid; that all just and lawful offsets, credits, discounts and payments have been allowed and the said amount is due, after said allowance and exclusive of all set-offs and just grounds of defense; that the goods in said accounts were sold and delivered as therein charged and on said last named day said amount became due and payment thereof was demanded and no part of same has been paid.

The affiant is not able to determine whether or not the debtor is in the military service of the United States.

Sworn to and subscribed before me this 8th day of SEPTE 1971,
Signature of Officer Grant J. VP.

HENRY P. ALLMARKS
Notary Public, State of New York
No. 30-0050000 - Qualified in Nassau Co
Cert. filed in Queens County
Commission Expires March 30, 1973

Notary Public Signature Henry P. Allmarks

*Use paragraph covering.

My commission expires _____

Sheriff claims 3 miles of
Ten Cents per mile Total \$.30
TAYLOR WILKINS, Sheriff
BY Talbert
DEPUTY SHERIFF

Received day of 28 Sept 1971
and on 28 Sept 1971
I served a copy of the within StC
on Todd Memorial
By service on William Todd
TAYLOR WILKINS Sheriff
Dr. W. C. Talbert
3 miles South of Bly

10,037

SUMMONS AND COMPLAINT

House of Pfaff, Inc.,
Plaintiff,
Versus
Todd Memorials,
Defendant.

FILED

SEP 23 1971

EUNICE B. BLACKMON circuit clerk