

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 2224-----

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ~~BEN H. HUXFORD, formerly doing business under~~  
~~the name of SPORTSMAN'S STORE,~~

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

~~BEN H. HUXFORD, formerly doing business under the name of~~ Defendant  
~~SPORTSMAN'S STORE~~

by ~~OSBURN BROTHERS, a partnership composed of A. P. Ogburn and~~  
~~R. W. Ogburn Jr.,~~ Plaintiff.

Witness my hand this 6th day of April 1954

\_\_\_\_\_, Clerk

No. 2224\_\_\_\_\_

Page-----

The State of Alabama

Baldwin County

CIRCUIT COURT

OGBURN BROTHERS, a partnership  
composed of A. P. Ogburn and

composed of A. P. Ogburn and

R. W. Ogburn Jr.

Plaintiffs

vs.

BEN H. HUXFORD, formerly doing  
business under the name of  
SPORTSMAN'S STORE.

business under the name of

SPORTSMAN'S STORE.

Defendants

## Summons and Complaint

Filed 6th April 1951

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

- 19

., Sheriff

I have executed this summons

this \_\_\_\_\_ 19\_\_

by leaving a copy with

Sheriff

Deputy Sheriff

OGBURN BROTHERS, a partnership  
composed of A. P. Ogburn and  
R. W. Ogburn, Jr.,

Plaintiff,

Versus

BEN H. HUXFORD, formerly doing  
business under the name of  
SPORTSMAN'S STORE,

DEFENDANT.

) IN THE CIRCUIT COURT  
) OF  
) MOBILE COUNTY, ALABAMA  
) AT LAW  
) NO. \_\_\_\_\_  
)  
)

C O M P L A I N T

COUNT ONE

The plaintiff claims of the defendant One Thousand Four  
Hundred Thirty-Eight and 76/100 Dollars (\$1,438.76), due from him  
by an account on, to-wit, the 1st day of December, 1953, which sum  
of money, with the interest thereon, is still unpaid.

COUNT TWO

The plaintiff claims of the defendant One Thousand Four  
Hundred Thirty-Eight and 76/100 Dollars (\$1,438.76), due from him  
by account stated between the plaintiff and the defendant on, to-wit,  
the 1st day of December, 1953, which sum of money, with the interest  
thereon, is still unpaid.

Smith Hand Arendall & Beckwith  
Attorneys for Plaintiff

OGBURN BROTHERS, a partnership  
composed of A. P. Ogburn and  
R. W. Ogburn, Jr.,

Plaintiff,

Versus

BEN H. HUXFORD, formerly doing  
business under the name of  
SPORTSMAN'S STORE,

DEFENDANT.

) IN THE CIRCUIT COURT  
)  
) OF  
) MOBILE COUNTY, ALABAMA  
)  
) AT LAW  
)  
) NO. \_\_\_\_\_  
)  
)

C O M P L A I N T

COUNT ONE

The plaintiff claims of the defendant One Thousand Four Hundred Thirty-Eight and 76/100 Dollars (\$1,438.76), due from him by an account on, to-wit, the 1st day of December, 1953, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO

The plaintiff claims of the defendant One Thousand Four Hundred Thirty-Eight and 76/100 Dollars (\$1,438.76), due from him by account stated between the plaintiff and the defendant on, to-wit, the 1st day of December, 1953, which sum of money, with the interest thereon, is still unpaid.

FILED

4-6 1954

ALICE J. DECK, Clerk

*Smith, Hand, Orndall & Bedsole*  
Attorneys for Plaintiff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 2224

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

BEN H. HUXFORD, formerly doing business under the name of, Defendant  
SPORTSMAN'S STORE

by OGBURN BROTHERS, a patnership composed of A. P. Ogburn and

R. W. Ogburn Jr.,, Plaintiff

Witness my hand this 6th day of April 19 54

*Archie A. Welch*

, Clerk

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Hold in File  
RECORDED  
No. 2224

Page 1

The State of Alabama

Baldwin County

CIRCUIT COURT

OGBURN BROTHERS, a partnership  
composed of A. P. Ogburn and  
R. W. Ogburn Jr.,

Plaintiffs

vs.

BEN H. HUXFORD, formerly doing  
business under the name of  
SPORTSMAN'S STORE,

Defendants

Summons and Complaint

Filed 6th April 1954

*Alice French* Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

April 6 1954

*Naylor & Williams*, Sheriff

I have executed this summons

this 6th April 1954

by leaving a copy with

*Not found. He  
is out of the State*

*Naylor & Williams* Sheriff  
*Edmund P. Williams* Deputy Sheriff

Since Edleigh  
Stales that Ben H.  
Hufford ~~was~~ moved  
to Florida

Quincy

SMITH, HAND, ARENDALL & BEDSOLE  
LAWYERS

HARRY H. SMITH  
COUNSELOR  
CHAS. C. HAND  
C. B. ARENDALL, JR.  
T. MASSEY BEDSOLE  
THOMAS G. GREAVES, JR.  
WM. BREVARD HAND  
VIVIAN G. JOHNSTON, JR.  
J. JEPHTA HILL

SUITE 622 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

MAILING ADDRESS

P. O. BOX 123  
MOBILE, ALA.

CABLE ADDRESS:  
HAB

April 3, 1954

Mrs. Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Bay Minette, Alabama

Dear Mrs. Duck:

We enclose the original and one copy of a complaint which we request be filed. We expect Mr. Huxford will be in Baldwin County within the immediate future and will attempt to get personal service on him at that time. We shall advise you when it is determined that he is in the county so that you can have the Sheriff serve him.

We enclose an extra copy of this letter and request that you note on the bottom of the same the receipt of the complaint and return it to us in the self-addressed stamped envelope.

Yours very truly,

SMITH, HAND, ARENDALL & BEDSOLE

By *W. B. Hand*

WBH.dd  
Encl.



2224

Ogden Brothers

vs

Ben W. Hafford

on account -  
4-6-54

Smith, Horn, Arundell  
& Bedson -