

SUMMONS

THE STATE OF ALABAMA     )  
                                  )  
BALDWIN COUNTY            )

2259

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon JOHN MINCHEW, 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 Bay Minette, against JOHN MINCHEW, by GULF SAUSAGE COMPANY.

WITNESS my hand this the 14th day of May 1954.

Rebecca A. Hensley  
Clerk

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COMPLAINT

GULF SAUSAGE COMPANY,     )  
                                  )  
                  Plaintiff     )  
                                  )  
VS:                            )  
                                  )  
JOHN MINCHEW,                )  
d/b/a/ Marlow Grocery        )  
                                  )  
                  Defendant    )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COUNT I:

The plaintiff claims of the defendant the sum of THREE HUNDRED THIRTY THREE & 94/100 DOLLARS (\$333.94), together with interest thereon, due from him by account on, to wit: the 14th day of May, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant the sum of Three Hundred Thirty Three & 94/100 DOLLARS (\$333.94), together with interest thereon, due from him on account stated between the plaintiff and the defendant on, to wit: the 14th day of May, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant the sum of THREE HUNDRED THIRTY THREE & 94/100 DOLLARS(\$333.94), together with interest thereon, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 14th day of May, 1954, which sum of money, with interest thereon, is still unpaid.

There is attached hereto and made a part 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 14th day of May, 1954.

James H. Smith  
Attorney for Plaintiff

# GULF SAUSAGE CO.

WHOLESALE DEALERS

ROBERTSDALE, ALABAMA

P. O. BOX 326

DIAL

AL 381

JAMES A. SANCA, JR.

ROBERT A. SANCA

RICHARD L. SANCA

STATE OF ALABAMA )  
BALDWIN COUNTY )

I, James A. Sanca, Jr., partner in the firm known as Gulf Sausage Company of Robertsdale, Alabama, a partnership owned and operated by James A. Sanca, Jr., Robert A. Sanca and Richard L. Sanca, do hereby swear and affirm as follows:

That we sold merchandise to the Marlow Grocery located at Marlow, owned by John Minchew and Lorene Minchew, husband and wife, itemized under our statements as follows:

No. 00633	11/20/53	\$91.62	Chg.	\$75.00	Cr.	Net
No. 00481	11/25/53	37.09				\$16.62
No. 00331	12/4/53	52.06				37.09
No. 00296	12/11/53	33.24				52.06
No. 01455	12/18/53	39.32				33.24
No. 01270	1/8/54	39.72				39.32
no. 00897	1/23/54	69.36		5.00		34.72
No. 01798	1/29/54	56.28		4.75		69.36
						51.53
TOTAL		\$418.69		\$84.75		\$333.94

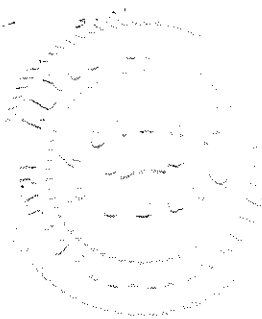
That the above invoices are filed and constitute a complete record of accounts receiveable against said Marlow Grocery and are available for inspection.

Subscribed and sworn to this 14th day of May, 1954.

James A. Sanca Jr.  
For Gulf Sausage Company

Signed, sealed and delivered in my presence this 14th day of May, 1954.

Alyce L. Bill  
Notary Public



Received 17 day of May 1954  
and on 28 day of May 1954  
I served a copy of the within  
on \_\_\_\_\_

By serv<sup>ice</sup> on John Minchew

TAYLOR WILKINS, Sheriff

By Edleugh Stead

SUMMONS & COMPLAINT

GULF SAUSAGE COMPANY

VS:

JOHN MINCHEW

FILED

MAY 17 1954

ALICE L. DUCK, Clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA