

#### SUMMONS

THE STATE OF ALABAMA,
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to summon LAWRENCE A. GRASS, d/b/a Buddy's Cleaners, 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 LAWRENCE A. GRASS, d/b/a Buddy's Cleaners, by F. H. ROSS & COMPANY, an Alabama corporation.

Witness my hand this the 25 day of May 1954.

Aliceforenche Merk

## COMPLAINT

F. H. ROSS & COMPANY, CORP.
Plaintiff

VS:

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

LAWRENCE A. GRASS, d/b/a Buddy's Cleaners Defendant

#### COUNT I:

The Plaintiff claims of the Defendant the sum of TWO HUNDRED FIFTEEN and 82/100 DOLLARS(\$215.82), together with interest thereon, due from the Defendant 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 TWO HUNDRED FIFTEEN and 82/100 DOLLARS (\$215.82), 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 TWO HUNDRED FIFTEEN and 82/100 DOLLARS (\$215.82), 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 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 <a href="L4th">14th</a> day of May, 1954.

Attorney for Plaintiff

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and for said State and Sounty J. W. McCain who, being sworn on eath, decess and says that he is Credit Manager of F. H. Ross & Company a corporation, and that he knows of his own knowledge that the autached account and every item thereon is just, true and correct and the amount thereof \$215.82 , with interest thereon is due and unpaid and that there are no counter claims or offsets against the same.

Subscribed and sworn to before so this lith day of May 1951.

Monary Palite

My Commission Expires October 17, 1954

PHONE 54-7618

# F. H. ROSS & COMPANY

P. O. BOX 2044

202 S. 12th Street BIRMINGHAM 5, ALA.

THIS STATEMENT INCLUDES INVOICES THRU

STATEMENT ACCOUNT OF:

Buddy's Cleaners

Foley, Ala.			
		) ·	PAY LAST AMOUNT IN THIS COLUMN
DATE TERMS FOLIO NO.	CHARGE	CREDITS	BALANCE
4/8/53 2% 10 EOM 3971 4/1/53 2/10 EOM 3810 4/13/53 2/10 EOM 4086 4/21/53 2/10 EOM 4266 4/24/53 2/10 EOM 4284 5/5/53 2/10 EOM 4547 5/5/53 2/10 EOM 4546 5/12/53 2/10 EOM 4694 5/25/53 2/10 EOM 4961 5/25/53 2/10 EOM 5296 5/27/53 2/10 EOM 5019 5/5/53 2/10 EOM 5019 6/5/53 2/10 EOM 5187 9/14/53 CR 12/11/53 RET.CHECK 12/29/53 CR 1/15/54 RET.CHECK 1/22/54 RET.CHECK 1/26/54 CR	20.51 37.38 4.64 80.34 10.02 1.05 47.62 31.93 5.00 4.96 28.17 5.81 28.47 22.18 26.54 48.36	152.89- 21.93- 12.34-	57.89 62.53 142.87 152.89 153.94 201.56 233.49 238.49 243.45 271.62 277.43 305.90 153.01 175.19 153.26 179.80 228.16 215.82
	MOORE BUSINESS FORMS, INC., DENTON, TEXA	s	

SUMMONS AND COMPLAINT

F. H. Ross & Company, Corp.
Plaintiff

VS:

bley Steeler

Lawrence A. Grass, d/b/a Buddy's Cleaners Defendant

FILED MAY 25 1954 ALICE I. DUCK, Clerk

LAW OFFICE OF FOREST A. CHRISTIAN FOLEY, ALABAMA