

WATSON HARDWARE	COMPANY,	Ĭ	in the circuit court of
A Corporation,	_	Ď	
	PLAINTIFF,	χ	BALDWIN COUNTY, ALABAMA
VS		X	ATIAW-
ν.ο		Q	
S. W. JACOBS,		Y	
,		Q	
	DEFENDANT.		en den dieste andere dieste gegen der

Comes the Defendant and for answer to the complaint filed in said cause and to each count thereof, separately and severally says as follows:

1.

As to Count One he denies the allegations thereof.

2.

As to Count Two he denies the allegations thereof.

FILED

JUN 14 1954

ALICE J. DUCK, Clerk

Attorney for the Defendant.

The State of Alabama, Baldwin County

		CIRCUIT	COURT		
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To Any Sheriff of the Sta	te of Alaba	ama—Greeting	(:		
You are hereby comma	nded to sun	nmon	Incons		
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to appear in the Circuit Cor of holding the same and ple	urt of		er mingsver at meravera et 1990 (1990) ut paus en para titlisett bilde i Nest ver m	County, Alabama,	at the place
of holding the same and ple	ad, answer,	, o f delilut, w ith	in thirty days from	service hereof to the	complaint of
watson Hardware Co	ompany, a	Corporation			
Witness this 3/st		**************************************			
Witness this 3/	day of	iky	alice 1		~ .
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IF THE DEFENDANT F. DAYS AFTER SEI	AIL TO AF	PEAR AND P	LEAD, ANSWER	OR DEMUR WITHI	N THIRTY
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a Corporation		vs	5.5 (
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	Pl	aintiff	1990); ((1995) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996) (1996)		efendant
1. And the Plaintiff c	laim of	the Defendant			
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(99/100 (\$280.99)					Dollars, due
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Code 1940, Tit. 7, Secs. 183, 218.

Sheriff.

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	VS	S	Plaintiff
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The State of Alabama

COUNTY.

Whereas, the Plaintiff..... in the within stated cause ha...... made affidavit and given bond as required by law, you are hereby required to take the property mentioned in the complaint into your possession, unless the Defendant..... give..... bond payable to the Plaintiff.... with sufficient surety in double the amount of the value of the property, with condition that if the Defendant......

, Clerk.

The	State	of Alabama,	Baldwin
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Witness this 3/2 day of May 1954. Witness this 3/2 day of May 1954. F THE DEFENDANT FAIL TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRT DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT COMPLAINT Watson Hardware Company, S. W. Jacobs 2 Corporation VS. Plaintiff. Defendant the sum of TWO HUNDRED EIGHTY and (98/100 (\$280.99)) Dollars, du by the Defendant to the Plaintiff on open account on, to-wit, October 20, 1953, which said sum of money with the interest thereon is still due and unpaid. The Plaintiff claims or the Defendant the sum of Two Hundred Eighty and (99/100 (\$280.99) Dollars, due by the Defendant on, to-wit, Sctober 20, 19thich said sum of money tegether with the interest thereon is still due and unpaid. The Flaintiff has stached to the original complaint filed in this cause in itemized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the		•		-	
You are hereby commanded to summon S. W. Jacobs o appear in the Circuit Court of Baldwin County, Alahama, at the place of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of Watson Hardware Company, a Corporation Witness this 3/5/ day of May Watson Hardware Company, A COMPLAINT COMPLAINT Watson Hardware Company, S. W. Jacobs a Corporation VS. Plaintiff Defendant And the Plaintiff claims of the Defendant the sum of TWO HUNDRED EIGHTY and Sep/100 (\$280.99) Dollars, du by the Defendant to the Plaintiff on open account on, to-wit, October 20, 1903, which said sum of money with the interest thereon is still due and unpaid. The Plaintiff claims of the Defendant the sum of TWO Hundred Eighty and Sep/100 (\$280.99) Dollars, due by the Defendant to the plaintiff for good, wares, and merchandise sold by the Plaintiff to the Defendant on, to-wit, October 20, 1903, which said sum of money tegether with the interest thereon is still due and unpaid. The Flaintiff has stached to the original complaint filed in this cause in temized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the risk of said cause.		- 10 10 10	CIRCUIT COU	RT -	
You are hereby commanded to summon S. W. Jacobs o appear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of watson Hardware Company, a Corporation Witness this 3/5 day of May 19.54 Witness this 3/5 day of May 19.54 F THE DEFENDANT FAIL TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT COMPLAINT Watson Hardware Company, S. W. Jacobs 2. W. Jacobs 3. W. Jacobs 3. W. Jacobs 4. W. Jacobs 4. W. Jacobs 5. W. Jacobs 5. W. Jacobs 6. W. Jacobs 6. W. Jacobs 6. W. Jacobs 7. W. Jacobs 7. W. Jacobs 7. W. Jacobs 7. W. Jacobs 8. W	To A			-	
papear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of watson Eardware Company, a Corporation Witness this 3/5 day of May 1954 Witness this 3/5 day of May 1954 FIHE DEFENDANT FAIL TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT COMPLAINT Watson Hardware Company, S. M. Jacobs VS. Plaintiff VS. Plaintiff Company, S. M. Jacobs Defendant And the Plaintiff claims of the Defendant the sum of Two Hundred Eighty and 199/100 (\$280.99) Dollars, due by the Defendant to the plaintiff for good, wares, and merchandise sold by the Flaintiff to the Defendant on, to-wit, Schoer 20, 1959 Mich said sum of money tegether with the interest thereon is still due and unpaid. Hard Hardle ATORNEY FOR FLAINTIFF The Flaintiff has stached to the original complaint filed in this cause in itemized and verified statement of the account of the Defendant with the laintiff end gives notice that the same will be offered in evidence at the risk of said cause.	the same of the same of the same of	1 1			
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Witness this. 3/2 day of May Clerk F THE DEFENDANT FAIL TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT COMPLAINT Watson Hardware Company, a Corporation VS. Plaintiff. Defendant No. W. Jacobs. A Corporation VS. Plaintiff. Claims of the Defendant the sum of TWO HUNDRED EIGHTY and Clerk Self-100 (\$280.99) Dollars, due by the Defendant on, to-wit, October 20, 1955, which said sum of money with the interest thereon is still due and unpaid. The Plaintiff claims or the Defendant to the plaintiff for good, wares, and Marchandise sold by the Plaintiff to the Defendant on, to-wit, Gotober 20, 1956, which said sum of money tegether with the interest thereon is still due and unpaid. Witness this. 3/2 day of Marchandise sold by the Plaintiff to the Defendant on, to-wit, Gotober 20, 1956, which said sum of money tegether with the interest thereon is still due and unpaid. WITHOUT FOR FLAINTIFF The Plaintiff has attached to the original complaint filed in this cause in temized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the rial of said cause.	*******************************				
Witness this. 3/2 day of May F THE DEFENDANT FAIL TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT COMPLAINT Watson Hardware Company, a Corporation VS. Plaintiff. S. W. Jacobs. And the Plaintiff. claims. of the Defendant. the sum of TWO HUNDRED EIGHTY and (99/100 (\$280.99)) Dollars, due by the Defendant to the plaintiff for good, wares, which said sum of money with the interest thereon is still due and unpaid. The Plaintiff claims of the Defendant to the plaintiff for good, wares, and merchandise sold by the Plaintiff to the Defendant on, to-wit, Getober 20, 195 which said sum of money tegether with the interest thereon is still due and unpaid. The Plaintiff has attached to the original complaint filed in this cause in themized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the risk of said cause.	o appear in the Ci	reuit Court of	Baldwin	County Alaba	
Witness this 3/2 day of May 1954 Clerk F THE DEFENDANT FAIL TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT COMPLAINT Watson Hardware Company, a Corporation VS. Plaintiff. And the Plaintiff. Claims. of the Defendant. the sum of TWO HUNDRED EIGHTY and (99/100 (\$280.99)) Dollars, due by the Defendant to the Plaintiff on open account on, to-wit, October 20, 1903, which said sum of money with the interest thereon is still due and unpaid. The Plaintiff claims of the Defendant to the plaintiff for good, wares, and merchandise sold by the Plaintiff to the Defendant on, to-wit, October 20, 195 which said sum of money tegether with the interest thereon is still due and unpaid. The Plaintiff has attached to the original complaint filed in this cause in itemized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the rial of said cause.				lays from service hereof to	the complaint o
COMPLAINT Watson Hardware Company, a Corporation Plaintiff Plaintiff And the Plaintiff claims of the Defendant the sum of Two Hundred Eighty and the Defendant to the Plaintiff claims or the Defendant the sum of Two Hundred Eighty and the Plaintiff claims or the Defendant the sum of Two Hundred Eighty and the Plaintiff claims or the Defendant to the plaintiff for good, wares, thich said sum or money with the interest thereon is still due and unpaid. The Plaintiff claims or the Defendant the sum of Two Hundred Eighty and 19/100 (\$250.99) Dollars, due by the Defendant to the plaintiff for good, wares, and merchandise sold by the Plaintiff to the Defendant on, to-wit, Gctober 20, 1955, which said sum of money tegether with the interest thereon is still due and unpaid. Hard Horalle ATTORNET FOR FLAINTIFF The Plaintiff has attached to the original complaint filed in this cause in itemized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the risk of said cause.	Watson Hard	ware Company, a	Corporation		
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COMPLAINT Watson Hardware Company, a Corporation Plaintiff Plaintiff Operendant Complaintiff Operendant Land the Plaintiff Campany, plaintiff Operendant No. W. Jacobs Defendant Operendant Operend	The state of the s		\mathcal{U}	erce + Huc	Clerk
Watson Hardware Company, a Corporation Plaintiff. And the Plaintiff. claims. of the Defendant. the sum of TWO HUNDRED EIGHTY and (99/100.(\$280.99) Dollars, due of the Defendant the sum of Two Hundred Eighty and c. The Plaintiff claims of the Defendant the sum of Two Hundred Eighty and 19/100 (\$280.99) Dollars, due by the Defendant to the plaintiff for good, wares, and merchandise sold by the Plaintiff to the Defendant on, to-wit, Sctober 20, 195 which said sum of money tegether with the interest thereon is still due and unpaid. Hard Marchandise The Plaintiff has sttached to the original complaint filed in this cause in itemized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the rial of said cause.	F THE DEFEND	ANT FAIL TO A	PPEAR AND PLEAD, A	NSWER OR DEMUR WIT	THIN THIRTY
Watson Hardware Company, a Corporation VS. Plaintiff Defendant And the Plaintiff claims of the Defendant the sum of TWO HUNDRED FIGHTY and (99/100 (\$280.99) Dollars, due by the Defendant to the Plaintiff on open account on, to-wit, October 20, 1953, which said sum of money with the interest thereon is still due and unpaid. The Plaintiff claims of the Defendant the sum of Two Hundred Fighty and 19/100 (\$280.99) Dollars, due by the Defendant to the plaintiff for good, wares, and merchandise sold by the Plaintiff to the Defendant on, to-wit, Gctober 20, 1951 which said sum of money tegether with the interest thereon is still due and unpaid. ATTORNEY FOR FIAINTIFF The Flaintiff has attached to the original complaint filed in this cause in itemized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the rial of said cause.	TAIS AFI	THE SHIPLICE IT	*	11.1	FAULT
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Dollars, due by the Defendant to the Plaintiff on open account on, to-wit, October 20, 1953, which said sum of money with the interest thereon is still due and unpaid. 2. The Plaintiff claims of the Defendant the sum of Two Hundred Eighty and 19/100 (\$280.99) Dollars, due by the Defendant to the plaintiff for good, wares, and merchandise sold by the Plaintiff to the Defendant on, to-wit, Sctober 20, 195 which said sum of money tegether with the interest thereon is still due and unpaid. ATTORNET FOR FLAINTIFF The Plaintiff has attached to the original complaint filed in this cause in itemized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the rial of said cause.	And the Plainti	iffclaims of	the Defendant the sur	of TWO HUNDRED EIGHT	Y and
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The Plaintiff has attached to the original complaint filed in this cause itemized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the rial of said cause.					
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The Plaintiff has attached to the original complaint filed in this cause in itemized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the rial of said cause.	37 TOO (\$250.9	a) norrars, due	Dy the Defendant to	the plaintiff for	. J
The Plaintiff has attached to the original complaint filed in this cause in itemized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the rial of said cause.	Dr. merchandiaa	sold by the Pi	aintiff to the Defen	dant on to-wit Got	nhom 20 305
The Plaintiff has attached to the original complaint filed in this cause in itemized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the rial of said cause.	hichoada	or money regeth	OF WITH the interact	thereon is still due	and unpaid.
The Plaintiff has attached to the original complaint filed in this cause in itemized and verified statement of the account of the Defendant with the laintiff and gives notice that the same will be offered in evidence at the rial of said cause.	hich said sum		11001000		~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
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ATTORNEY FOR PLAINTIFF	The Plaint: n itemized and laintiff and gi	iff has attache verified state ives notice tha	ATTO	First FOR FLAINTIFF mplaint filed in this of the Defendant with	cause
	The Plaint: n itemized and laintiff and gi	iff has attache verified state ives notice tha	ATTO d. to the original comment of the account of the same will be or	CRNEY FOR FLAINTIFF mplaint filed in this of the Defendant with refered in evidence at	the the
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STATE OF ALABAMA

ESCAMBIA COUNTY

Before me, the undersigned authority in and for said State and County, personally appeared R. B. Watson, President of the Watson Hardware Company, a Corporation, Atmore, Alabama, who is known to me and being by me first duly sworn doth depose and say that the attached statement of account of S. W. Jacobs is a true and correct statement thereof; and that after all just credits and offsets are given the said S. W. Jacobs is indebted to the said Watson Hardware Company, a Corporation in the sum of \$280.99.

Sworn to and subscribed before me this 24 day of May, 1953.

Lera Gette Stunding

May 25, 1954

Mrs. Alice Duck Clerk of Circuit Court Mercelarowton, Alabama

> Re: Watson Hardware Company Vs. S. W. Jacobs

Dear Mrs. Duck:

I am enclosing herewith original and copy of summons and complaint which I desire filed. Thanking you, I am

Sincerely,

HR: jd

STATEMENT

WATSON HARDWARE COMPANY, INC.

"The Right Place To Trade"

Hardware, Furniture, Farming Implements and Building Supplies

ATMORE, FLOMATON, BREWTON, ALABAMA

S.W. Jacobs Route # 1 Bay Minette, Alabama

NET CASH. Accounts are due not later than the tenth of each month,

Date	Reference No.	Cha	arges	Credits		Balance
				Bal. Br't Forw	ard	
0ct 20 53	A4029	Pump Heater Tax	204.70 89.95 294.65 8.89			
		By Cash	303.49 45.00			
		c.c.	258.49 22.50			
	-		280.99			280.99
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Notify us promptly of any errors in this statement and change of address. Pay last amount above

