

WATSON HARDWARE COMPANY,
A Corporation,

PLAINTIFF,

VS

S. W. JACOBS,

DEFENDANT.

22841

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
ATLAW.

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.

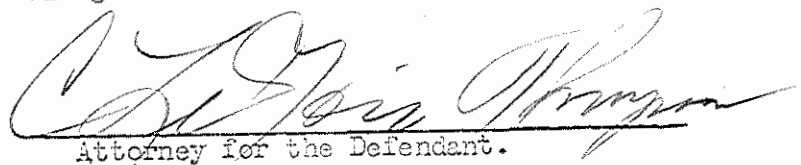
2.

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

To Any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon S. W. Jacobs

to 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 31st day of May, 1954

Alice J. Murch, Clerk.

IF 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

Plaintiff

VS.

S. W. Jacobs

Defendant

1. 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, 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 99/100 (\$280.99) Dollars, due by the Defendant to the plaintiff for goods, wares, and merchandise sold by the Plaintiff to the Defendant on, to-wit, October 20, 1953, which said sum of money together with the interest thereon is still due and unpaid.

Hugh Rozelle
ATTORNEY FOR PLAINTIFF

The Plaintiff has attached to the original complaint filed in this cause an itemized and verified statement of the account of the Defendant with the Plaintiff and gives notice that the same will be offered in evidence at the trial of said cause.

Hugh Rozelle
ATTORNEY FOR PLAINTIFF

Received this _____ day of _____, 19_____,
_____, Sheriff.

Executed this _____ day of _____, 19_____,
by leaving a copy of the within Summons
and Complaint with _____

Defendant _____

Sheriff _____

No. 2284

The State of Alabama

_____ COUNTY.

CIRCUIT COURT

Plaintiff _____

vs.

Defendant _____

Summons and Complaint

Filed this 31st day of

May, 1954

Deirdre B. [Signature]
Clerk.

Plaintiff's Attorney.

The State of Alabama

_____ COUNTY.

To the Sheriff of _____ County:

Whereas, the Plaintiff _____ in the within
stated cause has _____ made affidavit and given
bond as required by law, you are hereby re-
quired 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 _____

cost in the suit, _____
within thirty days thereafter, deliver the
property to the Plaintiff _____, and pay all
costs and damages which may accrue from
the detention thereof.

_____, Clerk.

The State of Alabama, Baldwin County

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon S. W. Jacobs

to 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 31st day of May, 1954

Reice H. Huckle, Clerk.

IF 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.

S. W. Jacobs

Plaintiff

Defendant

1. 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, 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
99/100 (\$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, 1953,
which said sum of money together with the interest thereon is still due and unpaid.

Hugh Rozelle
ATTORNEY FOR PLAINTIFF

The Plaintiff has attached to the original complaint filed in this cause
an itemized and verified statement of the account of the Defendant with the
Plaintiff and gives notice that the same will be offered in evidence at the
trial of said cause.

Hugh Rozelle
ATTORNEY FOR PLAINTIFF

STATE OF ALABAMA

ESCAMBIA COUNTY

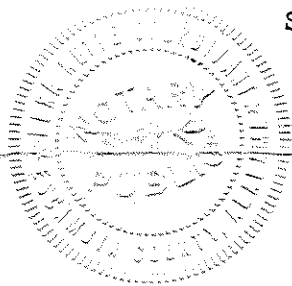
Before me, the undersigned authority in and for said State and County, personally appeared R. B. Watson, President of the Watson Hardware Company, a Corporation, Atmore, Alabama, who

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.




NOTARY PUBLIC

HUGH ROZELLE
ATTORNEY-AT-LAW
2ND FLOOR BANK OF ATMORE BLDG.
ATMORE, ALABAMA

PHONES { 495-W
287

May 25, 1954

Bay Minette
Mrs. Alice Duck
Clerk of Circuit Court
Bay Minette, 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

and with Personal regards,

Sincerely,

Hugh Rozelle
Hugh Rozelle

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.	Charges	Credits	Balance
			Bal. Br't Forward	
Oct 20 53	A4029	Pump 204.70 Heater 89.95 <u>294.65</u> Tax 8.89 <u>303.49</u> By Cash 45.00 <u>258.49</u> C.C. 22.50 <u>280.99</u>		280.99

Notify us promptly of any errors in this statement and change of address. Pay last amount above