

2288

SUMMONS

THE STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:-

YOU ARE HEREBY COMMANDED to summon GEORGE D. INGRAM, d/b/a INGRAM ELECTRIC COMPANY to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, then and there to answer the complaint of MCGOWIN-LYONS HARDWARE & SUPPLY COMPANY.

Witness my hand this the 3<sup>rd</sup> day of June, 1954.

W. J. [Signature]  
Clerk

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COMPLAINT

MCGOWIN-LYONS HARDWARE & SUPPLY CO. )  
Plaintiff )  
VS: )  
GEORGE D. INGRAM, d/b/a )  
INGRAM ELECTRIC COMPANY )  
Defendant )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COUNT I:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED EIGHTY ONE & 53/100 DOLLARS (\$181.53), together with interest thereon, due from him by account on, to wit: the 24th 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 ONE HUNDRED EIGHTY ONE & 53/100 DOLLARS (\$181.53), together with interest thereon, due from him by account stated between the Plaintiff and the defendant on, to wit: the 24th 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 ONE HUNDRED EIGHTY ONE & 53/100 DOLLARS (\$181.53), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to wit: the 24th day of May, 1954, which sum of money, with interest thereon is still unpaid.

[Signature]  
Attorney for Plaintiff

There is attached to the original and made a part hereof an itemized statement of account sworn to by the Secretary of the Plaintiff showing the amount due on this account as of May 24, 1954.

[Signature]

## STATEMENT

# McGOWIN-IVONS HARDWARE & SUPPLY CO.

WATER AT ST. LOUIS STREET

P. O. BOX 1209

MOBILE 7, ALABAMA

MAY 24 1954

INGRAM ELECTRIC CO.  
P.O. BOX 358  
FOLEY ALA.

TO INSURE PROPER CREDIT, DESIGNATE WHAT INVOICE OR PART OF ACCOUNT YOUR REMITTANCE IS INTENDED TO PAY

DATE	CHARGES	CREDITS	BALANCE
		BALANCE FORWARD	
DEC 1 6	2 1.83		
DEC 1 7	3 6.00		
DEC 2 1	2 9.31		
DEC 2 2	2 1.83		
DEC 2 3	2 8.01		
JAN 7	7.42		
JAN 1 3	1 2.79		
JAN 2 5	1.86		
FEB 4	2 2.48		
			1 8 1.53 BA

70 2288  
6-8-54

Received 3 day of June 1954  
and on          day of          19        

I serve this copy of this writ on           
on 6-8-54

By service on           
        

TAYLOR WILKINS, Sheriff  
By Margaron D. S.

SUMMONS & COMPLAINT  
Hardware  
McGowin Lyons/& Supply Co.

VS:

George D. Ingram, dba  
Ingram Electric Co.

FILED  
JUN 3 1954  
ALICE L. DUCK, Clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

STATE OF ALABAMA

COUNTY OF MOBILE

Before me, the undersigned authority in and for aforesaid county and state, who as a notary public  
by my seal of office, which seal of office is hereto attached, personally appeared

C. M. Surces known to me, who being duly sworn, upon his oath stated he is  
treasurer of MCGOWIN LYONS HARDWARE AND SUPPLY

COMPANY, a corporation organized and doing business under the laws of ALABAMA; that as such he  
executes this affidavit; that he is familiar with the books and business of MCGOWIN LYONS HARDWARE  
& SUPPLY COMPANY, that the attached account against Pyram Electric Co is

and correct within the knowledge of this affiant; that he has authority to make this affidavit and

he has personal knowledge of the matters contained herein; that the items thereon stated and  
posting the said account were sold and delivered to the said Pyram Electric Co at

special instance and request of the debtor and that credit has been duly given for all payments

just and lawful offsets to which said account is entitled as thereon stated and that the balance  
due of amounting to the sum of One Hundred Eighty One - 57.00 Dollars (\$ 181.53)

interest from \_\_\_\_\_, 19\_\_\_\_ is justly due and remains unpaid.

C. M. Surces.

and to, subscribed, acknowledged, signed and sealed before me, as a notary public under my seal  
of office, with my seal hereto affixed on this the 24 day of May, 19 54

Philip A. Nelson

A Notary Public in and for the

State of ALABAMA

County of Mobile