

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons ANGUS MERCHANT to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of HERBERT ENGLAND, doing business as H. ENGLAND LUMBER CO., Roberts-
dale, Alabama.

Witness my hand this the 30th day of Aug, 1954.

Alice J. Suck
Clerk

HERBERT ENGLAND, DOING BUSINESS
AS H. ENGLAND LUMBER CO.,
ROBERTSDALE, ALABAMA,
Plaintiff

vs

ANGUS MERCHANT,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. _____

COUNT ONE: The Plaintiff claims of the Defendant the sum of Three Hundred twenty Dollars and 07/100 (\$320.07) due by the Defendant to the Plaintiff on open account on, to-wit, the 25th day of November, 1953, which said sum of money together with the interest thereon is still due and unpaid.

COUNT TWO: The Plaintiff claims of the Defendant the sum of Three Hundred Twenty and 07/100 Dollars (\$320.07) due by the Defendant to the Plaintiff on account stated on to-wit, the 25th day of November, 1953, which said sum of money together with the interest thereon is still due and unpaid.

COUNT THREE: The Plaintiff claims of the Defendant the sum of Three Hundred Twenty and 07/100 Dollars (\$320.07) due by the Defendant to the Plaintiff for goods, wares and merchandise sold by the Plaintiff to the Defendant from on, to-wit, November 1, 1953 to November 25, 1953, which said sum of money together with the interest thereon is still due and unpaid.

FILED

8-5-54

ALICE J. SUCK, Clerk

James C. Hendrix
Attorney for Plaintiff

Mr. Angus Merchant
Summerdale, Ala.

2342

State of Alabama
Baldwin County

Before me Grady Gilbert Jr., Notary Public in
and for said county said state personally
appeared Ora Lee Zajicek who being by me
first duly sworn on her oath does depose and
say as follows: that she is the bookkeeper
of H. England Lumber Co. and that the verif-
ied statement of the account of Angus Merch-
ant ~~was~~ setoff here in above, is true and
correct statement of his account and that
there is now due on said account the sum of
\$320.07 after allowing the defendant said
Angus Merchant all just credits or setoff to
which he may be entitled.

Ora Lee Zajicek
Bookkeeper

Sworn to and subscribed before me on the 16
day of August, 1954

Grady Gilbert Jr.
Notary Public Baldwin County

STATEMENT

H. ENGLAND LUMBER COMPANY

LUMBER - PAINT - BUILDING SUPPLIES

ROBERTSDALE, ALABAMA

Mr. Angus Merchant
Summerdale, Ala.

INVOICE NO.	CHARGES	CREDIT	BALANCE
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STATEMENT RENDERED

10-12-53	21493	\$ 117.42	
13-	21508	24.14	
14-	21524	13.35	
16-	21571	19.30	
	21565	46.80	
	Returned	14.83	206.18
29-	21766	47.01	
11- 2-	21801	57.47	
6-	21881	9.41	320.07

FILED
JAN 16 1954

Angus Merchant