

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA :  
 ESCAMBA COUNTY :  
 TO ANY SHERIFF OF THE STATE OF ALABAMA. GREETINGS:

You are hereby commanded to summons Leslie Bryars to appear within thirty days from the service of this writ in the Circuit Court, then and there to answer the complaint of Lloyd Brinks, doing business as Appliance Specialty Company, Atmore, Alabama.

Witness my hand, this 4th day of Sept, 1954.

Deirdre J. Hensley  
 CLERK

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C O M P L A I N T

LLOYD BRINKS, DOING BUSINESS AS	:	IN THE CIRCUIT COURT OF
APPLIANCE SPECIALTY COMPANY,	:	
ATMORE, ALABAMA,	:	BALDWIN COUNTY, ALABAMA
PLAINTIFF	:	
	:	LAW SIDE
VS.	:	
	:	CASE NO. _____
LESLIE BRYARS,	:	
DEFENDANT	:	

COUNT ONE: The Plaintiff claims of the Defendant the sum of \$76.30 due by the Defendant to the Plaintiff on open account on, to-wit, July 3, 1954, 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 \$76.30 due by the Defendant to the Plaintiff on account stated, on, to-wit, July 3, 1954, 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 \$76.30 due by the Defendant to the Plaintiff for goods, wares, and merchandise sold by the Plaintiff to the Defendant from on, to-wit, March 13, 1954, to July 3, 1954, which said sum of money together with the interest thereon is still due and unpaid.

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 same will be used in evidence at the trial of said cause.

Hugh R. Agille  
 ATTORNEY FOR PLAINTIFF

STATE OF ALABAMA

ESCAMBIA COUNTY

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Before me, the undersigned authority in and for said State and County, personally appeared Lloyd Brinks, owner and doing business as Appliance Specialty Company, Atmore, Alabama, who is known to me and being by me first duly sworn doth depose and say that the statement of account of Leslie Bryars, is a true and correct statement thereof; and that after all just credits and offsets are given the said Leslie Bryars, is indebted to the said Lloyd Brinks, doing business as Appliance Specialty Company, Atmore, Alabama, in the sum of \$75.30.

Lloyd Brinks

Sworn to and subscribed before me this 1st day of September, 1954.

FILED

9-4-54

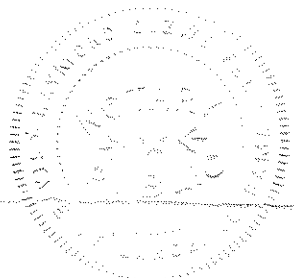
ERICE J. DUCK, Clerk

Raymond B. Buehler  
NOTARY PUBLIC  
My commission expires Feb. 12, 1957.  
Issued by The Employers Liability Assurance Corporation

ITEMIZED AND VERIFIED STATEMENT OF THE ACCOUNT OF THE DEFENDANT,  
LESLIE BRYARS, P. O. BOX 246, PERDIDO, ALABAMA

DATE OF PAYMENTS	PAYMENTS	BALANCE
March 13, 1954, #183-2-825 X 20-10 ply Mara. tires 2-825 X 20 HD Butyl tubes		\$176.37
March 13, 1954	\$30.07	
May 5, 1954	30.00	
May 29, 1954	25.00	
June 9, 1954	10.00	
July 3, 1954	5.00	

TOTAL	\$176.37
LESS CREDITS	100.07
BALANCE DUE	\$ 76.30



Received in Sheriff's Office  
this 2 day of Sept. 1954  
TAYLOR WILKINS, Sheriff

Received day of 10  
and on 8 day of Sept. 1954  
I served a copy of the within W. & C.  
on \_\_\_\_\_

By service on Ledlie Bryars

TAYLOR WILKINS, Sheriff  
By [Signature] D.S.

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
LAW SIDE, NO. 2375.

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LLOYD BRIMMS, DOING BUSINESS AS  
APPLIANCE SPECIALTY COMPANY,  
ATMORE, ALABAMA, PLAINTIFF

VS.

LEELIE BRYARS, DEFENDANT

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FILED FILED

SEP 4 1954

ALICE J. DUCK, CLERK

CLERK

HUGH ROZELLE  
ATTORNEY AT LAW  
ATMORE, ALA.

*Divi*  
*7/23/51*

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

PHONES { 495-W  
287

~~August 22, 1954~~  
*Sent 2, 1954*

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

Re: Lloyd Brinks doing business as Appliance Specialty Company vs. Leslie Bryars

Dear Mrs. Duck:

I am enclosing herewith original and copy of Summons and Complaint in connection with the above mentioned suit on account which I desire filed.

Thanking you and with personal regards, I am

Sincerely,



Hugh Rozelle

HR/gr