

JOE BROUGHTON, d/b/a
BROUGHTON'S GROCERY,

Plaintiff

-vs-

A.O. LASSITER

Defendant

IN THE CIRCUIT COURT

OF

BALDWIN COUNTY, ALABAMA

AT LAW

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2399

I

Comes the Defendant in the above styled cause and for a plea to the Plaintiffs complaint saith that the allegations of the complaint are untrue.

II

The Defendant, for answer to the complaint, saith that he is not guilty of the matter alleged therein.

III

The Defendant for further plea to the complaint says: That he has heretofore paid all of the debt complained of save the amount of five dollars (\$5.00), and that the said payment took place before the commencement of this action.

IV

Comes the Defendant in the above styled cause by his attorney and for further plea to the complaint says: There has been paid on behalf of the said Defendant to be applied on this debt all of the debt save an amount less than fifty dollars (\$50.00), to-wit, five dollars (\$5.00), to the attorney for the plaintiff in this cause, and that the said payment took place before the date of bringing this action.

William Hepler
Attorney at Law for Defendant

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon A. O. Lassiter 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 Joe Broughton d/b/a Broughton's Grocery.

Witness my hand, this the 6 day of October, 1954.

Deane J. Welch
Clerk.

JOE BROUGHTON, d/b/a
BROUGHTON'S GROCERY,

PLAINTIFF,

VS

A.O. LASSITER,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

1.

The Plaintiff claims of the Defendant the sum of Seventy-Five (\$75.00) Dollars, due from the Defendant by account on the 26th day of May, 1953, for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit, May 26, 1953; which sum of money with interest thereon is still unpaid.

W. H. Brown
Attorney for the Plaintiff.

Defendant located near Summerdale