

ALMUR S. WHITING
ATTORNEY AT LAW

TELEPHONES:
OFFICE: 2-3604
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ANNEX, FIRST NATIONAL BANK BUILDING
SUITE 708-9
MOBILE 6, ALABAMA

October 11, 1954

P. O. BOX 988

Honorable Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama.

Dear Mrs. Duck: Re: D. H. Holmes Company, Ltd. Vs: Mrs. Leon Giafaglione

We enclose herewith complaint in the above matter, on which please get out summons to the sheriff for service on the Defendant. We are not certain as to exactly where the defendant is, but we understand she is in Foley. I believe that Judge Mashburn represented her in some matter recently and may be able to tell us where this woman is and give us her present address. When service has been perfected on the debtor, will you please give me the date of service so that I may post the same ahead for a default judgment.

With kind personal regards and best wishes, I remain,

Yours truly,

ASW/g.
enc/

SUMMONS AND COMPLAINT

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County.

No. -----

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Mrs. Leon Giafaglione

also known as Margie Giafaglione

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Mrs. Leon Giafaglione, also known as Margie Giafaglione, Defendant

by D. H. Holmes Company LTD

Plaintiff

Witness my hand this 12th day of October 1954

Deice J. Ouch, Clerk

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. AT LAW.

D. H. HOLMES COMPANY, LTD.,

NO. _____

PLAINTIFF,

-vs-

MRS. LEON GIAFAGLIONE, also known
as Marjie Giafaglione

DEFENDANT.

COUNT ONE.

The Plaintiff claims of the Defendant the sum of \$298.12 due by her to the Plaintiff on account by and between Plaintiff and Defendant on to-wit: January 23, 1952, as shown by itemized statement of account, verified by affidavit, hereto annexed and made a part hereof, which said sum with the interest thereon is still unpaid.


A. S. WHITING, ATTORNEY FOR PLAINTIFF
708-09 Annex, 1st Nat'l Bank Building
Mobile, Alabama.

Note: Defendant is said to reside at Foley, Alabama.

THE STATE OF LOUISIANA
PARISH OF ORLEANS

Before me, the undersigned Notary Public, within and for the Parish and State aforesaid, on this day personally appeared J. GEORGE WETZEL

known to me who, being by me duly sworn, states on oath that the foregoing annexed account in favor of D. H. HOLMES COMPANY LTD.

which is a corporation organized and existing under the laws of the State of LOUISIANA

and of which corporation affiant is the authorized ASSISTANT TREASURER

AGENT, ATTORNEY, PRESIDENT OR SECRETARY

And which account is against MRS. LEON GIARAGLIONE

for the sum of TWO HUNDRED NINETY EIGHT and 12/100 ----- Dollars

is within the knowledge of affiant, just and true; that it is due and that all just and lawful offsets, payments and credits have been allowed.

J. George Wetzel
Sworn to and subscribed before me, the 21st day of July A. D., 1954

M. P. Geywater
Notary Public.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. AT LAW.

D. H. HOLMES COMPANY, LTD.,

NO. _____

PLAINTIFF, X


-VS-

MRS. LEON GIAFAGLIONE, also known X
as Marjie Giafaglione

DEFENDANT. X

COUNT ONE.

The Plaintiff claims of the Defendant the sum of \$298.12 due by her to the Plaintiff on account by and between Plaintiff and Defendant on to-wit: January 23, 1952, as shown by itemized statement of account, verified by affidavit, hereto annexed and made a part hereof, which said sum with the interest thereon is still unpaid.



A. S. WHITING, ATTORNEY FOR PLAINTIFF
708-09 Annex, 1st Nat'l Bank Building
Mobile, Alabama.

Note: Defendant is said to reside at Foley, Alabama.

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Circuit Court, Baldwin County

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by D. H. Holmes Company LTD -----

-----, Plaintiff.

Witness my hand this 12th day of October 19 54

Perce Jackson -----, Clerk