

BOOK 003 # 240

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

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

You are hereby commanded to summon, WALTER PENRY, 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, Alabama, at Bay Minette, against WALTER PENRY, by the GULF TELEPHONE COMPANY, INC.,

Witness my hand this the 8 day of November, 1954.

Ben J. Bensch
Clerk

COMPLAINT

GULF TELEPHONE COMPANY, INC.,
PLAINTIFF
VS:
WALTER PENRY,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT I:

The plaintiff claims of the defendant the sum of THREE HUNDRED SEVENTY ONE & 82/100 DOLLARS (\$371.82), together with interest thereon, due from him by account on, to wit: the 1st day of September, 1953, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant the sum of THREE HUNDRED SEVENTY ONE & 82/100 DOLLARS (\$371.82), together with interest thereon, due from him on account stated between the plaintiff and the defendant, on, to wit: the 1st day of September, 1953, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant the sum of THREE HUNDRED SEVENTY ONE & 82/100 DOLLARS (\$371.82), together with interest thereon, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 1st day of September, 1953, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 5th day of November, 1954.

FILED

11-8-54

ALICE J. BUCK, Clerk

James A. Chisler
Attorney for the Plaintiff

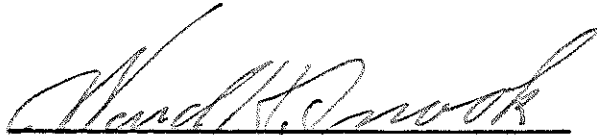
AFFIDAVIT OF WARD H. SNOOK

BOOK 003 PAGE 241

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

WARD H. SNOOK, first being duly sworn, deposes and says as follows:

I am president of the Gulf Telephone Company, Inc., the plaintiff in the case of GULF TELEPHONE COMPANY, INC. VS. WALTER PENRY. Walter Penry owes The Gulf Telephone Company the sum of THREE HUNDRED SEVENTY ONE & 82/100 DOLLARS (\$371.82), and after allowing all just credits, the sum of \$371.82 still remains due and unpaid.


Affiant

Sworn to and subscribed before me,
a Notary Public in and for Baldwin
County, Alabama, this the 5th day of
November, 1954.

FILED

11-8-54

ALICE I. DUCK, Clerk


Notary Public

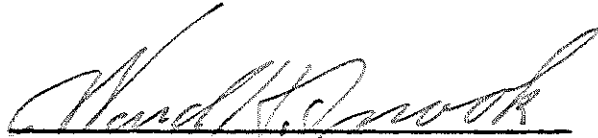
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Sworn to and subscribed before me,
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FILED
11-8-54
ALICE L. DUCK, Clerk


Notary Public

SEE OR CALL BOOKKEEPER IF MORE INFORMATION IS DESIRED

Duplicate Bill of June 20, 1953

GULF TELEPHONE CO. - - FOLEY, ALABAMA

TOLL	TOLL TAX	RENTAL	RENTAL TAX	MISCELLANEOUS	ARREARS	TOTAL
19.55 243.20	2.93 60.80			Advance to build straight line 115.99		442.47**

Penry Shed
Walter Penry
Robertsdale, Alabama

Tel. #941

DUE AND PAYABLE WITHIN TEN DAYS
(PLEASE BRING STATEMENT WHEN PAYING BILL)

SEE OR CALL BOOKKEEPER IF MORE INFORMATION IS DESIRED

Duplicate Bill of July 20, 1953
GULF TELEPHONE CO. - - FOLEY, ALABAMA

TOLL	TOLL TAX	RENTAL	RENTAL TAX	MISCELLANEOUS	ARREARS	TOTAL
14.70 148.95	2.21 37.24	7.00	1.05		442.47	653.62**

Penry Shed
Walter Penry
Robertsdale, Alabama

Tel. #941

DUE AND PAYABLE WITHIN TEN DAYS
(PLEASE BRING STATEMENT WHEN PAYING BILL)

SEE OR CALL BOOKKEEPER IF MORE INFORMATION IS DESIRED

Duplicate Bill of August 20, 1953
GULF TELEPHONE CO. - - FOLEY, ALABAMA

TOLL	TOLL TAX	RENTAL	RENTAL TAX	MISCELLANEOUS	ARREARS	TOTAL
1.00	.15				653.62	673.52**
15.00	3.75			Part Payment 8/19/53		200.00—
				" " 9/2/53		200.00—
				Balance Due		273.52

Penry Shed
Walter Penry
Robertsdale, Alabama

Tel. #941
Final Bill

DUE AND PAYABLE WITHIN TEN DAYS
(PLEASE BRING STATEMENT WHEN PAYING BILL)

SEE OR CALL BOOKKEEPER IF MORE INFORMATION IS DESIRED

Duplicate Bill of June 20, 1954
GULF TELEPHONE CO. - - FOLEY, ALABAMA

TOLL	TOLL TAX	RENTAL	RENTAL TAX	MISCELLANEOUS	ARREARS	TOTAL
11.65 43.10	1.75 10.78	5.50	.83			73.61**
Penry Shed Walter Penry Robertsdale, Alabama						

Tel. #772

DUE AND PAYABLE WITHIN TEN DAYS
(PLEASE BRING STATEMENT WHEN PAYING BILL)

SEE OR CALL BOOKKEEPER IF MORE INFORMATION IS DESIRED

Duplicate Bill of July 20, 1954
GULF TELEPHONE CO. - - FOLEY, ALABAMA

TOLL	TOLL TAX	RENTAL	RENTAL TAX	MISCELLANEOUS	ARREARS	TOTAL
2.05 12.80	.31 3.20	5.50	.83		73.61	98.30**

Penry Shed
Walter Penry
Robertsdale, Alabama

Tel. #772
Final Bill

DUE AND PAYABLE WITHIN TEN DAYS
(PLEASE BRING STATEMENT WHEN PAYING BILL)

and on 16 day of Nov 1954

received copy of the within Summons
and Complaint

By service on *Walter Penry*

TAYLOR WILKINS, Sheriff
By *Geo. Langford*

SUMMONS AND COMPLAINT

GULF TELEPHONE COMPANY, INC.

PLAINTIFF

VS:

WALTER PENRY,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

11-8-54

ALICE M. FOLEY, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

TONSMEIRE & HODNETTE
ATTORNEYS AND COUNSELLORS AT LAW
ANNEX FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

GEORGE A. TONSMEIRE
ROBERT E. HODNETTE, JR.

December 22, 1954

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

2439

In re: Gulf Telephone Company vs Walter Penry

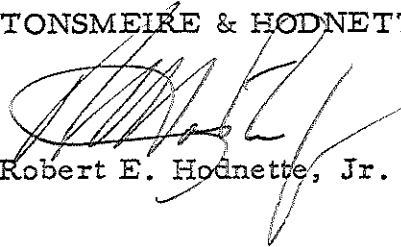
Dear Mrs. Duck:

I would appreciate your kindness in advising me
of the court costs in this case on dismissal by the plaintiff.

Mr. Christian and I have agreed on a settlement
and we are to pay the costs.

Very truly yours,

TONSMEIRE & HODNETTE


Robert E. Hodnette, Jr.

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