

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon GEORGE J. JOSEPH, individually, and doing business as JOSEPH'S BROKERAGE, 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 GEORGE J. JOSEPH, individually, and doing business as JOSEPH'S BROKERAGE, by the GULF TELEPHONE COMPANY, INC.

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

Archie L. Wicks
Clerk

COMPLAINT

GULF TELEPHONE COMPANY, INC.
PLAINTIFF

VS:

GEORGE J. JOSEPH, Individually, and
doing business as JOSEPH'S BROKERAGE,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT I:

The plaintiff claims of the defendant the sum of SEVEN HUNDRED FOURTEEN & 83/100 DOLLARS (\$714.83), together with interest thereon, due from him by account on, to wit: the 1st day of November, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant the sum of SEVEN HUNDRED FOURTEEN & 83/100 DOLLARS (\$714.83), together with interest thereon, due from him on account stated between the plaintiff and the defendant on, to wit: the 1st day of November, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant the sum of SEVEN HUNDRED FOURTEEN & 83/100 DOLLARS (\$714.83), 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 November, 1954, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof an affidavit by the president of the plaintiff, sworn to before a notary public, and an itemized statement of account, which shows the amount due on this account as of the 6th day of November, 1954.

W. R. ...
Attorney for Plaintiff

AFFIDAVIT OF WARD H. SNOOK

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

BOOK 003 PAGE 253

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: GEORGE J. JOSEPH, Individually, and doing business as JOSEPH'S BROKERAGE; George J. Joseph, Individually, and doing business as Joseph's Brokerage, is indebted to the Gulf Telephone Company, Inc. in the sum of SEVEN HUNDRED FOURTEEN & 83/100 DOLLARS (\$714.83), after allowing all just credits, the amount still remaining unpaid is SEVEN HUNDRED FOURTEEN & 83/100 DOLLARS (\$714.83), as is shown by the attached itemized statement of account.


Affiant

Sworn to and subscribed before me, a
Notary Public in and for Baldwin
County, Alabama, this the 6th day of
November, 1954.


Notary Public

Copy of George Joseph's Brokerage ledger sheet.

193.25	19.33	1.50	.15		214.23**	July 1, 1954
214.55	21.46	1.50	.15	214.23	451.89**	August 1, 1954
				Part payment 8/14/54	124.75—	
172.85	17.29	1.50	.15	327.14	518.93**	September 1, 1954
168.85	16.89	3.08	.32	518.93	708.07**	October 1, 1954
3.05	.31	3.08	.32	708.07	714.83**	November 1, 1954

The final amount of George Joseph's Brokerage is \$714.83.

and on _____ day of _____
I served a copy of the within-
on _____
By service on _____
BY _____
TAYLOR WILKINS, Sheriff
D. S.
By _____

Retained 17 day of Nov 1927
Not found in bay county after diligent search and in-
quiry.

Geo. S. ...
D. S.

lines at:

Old Moore
Old

End Florida
Short R. #

Shelby City
Received this the 14th day of
March 1927, by leaving copy
with George J. Joseph
Short Study Co. 1 Latham Series

Hagerdorfer place near
Elberta

SUMMONS AND COMPLAINT

GULF TELEPHONE COMPANY, INC.

PLAINTIFF

VS:

GEORGE J. JOSEPH, Individually,
doing business as JOSEPH'S BROKERAGE

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NOV 17 1927 AM 9:05

FILED

11-8-27

WILLIAM W. ...

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

True