

FAIRBANKS, MORSE & COMPANY,
a corporation,

Plaintiff

vs.

B. B. LARRIMORE, doing business as
Farmers Hardware & Supply Company

Defendants

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

AT LAW NO. 2499

COUNT I

The plaintiff claims of the defendant, \$2,641.28, due from him by account, on to-wit: February 11, 1954, which sum of money, with interest thereon, is still due and unpaid.

COUNT II

The plaintiff claims of the defendant, \$2,641.28, due from him on account stated between the plaintiff and the defendant on the 11th day of February, 1954, which sum of money, with interest thereon, is still due and unpaid.

COUNT III

The plaintiff claims of the defendant, \$2,641.28, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant, during the period May 5, 1953 to November 9, 1953, which sum of money, with interest thereon, is still due and unpaid.

PILLANS, REAMS, TAPPAN, WOOD & ROBERTS

BY: George F. Wood

Attorneys for Plaintiff

The account, upon which this suit is based, is itemized and verified by affidavit, which is attached hereto and made a part hereof.

PILLANS, REAMS, TAPPAN, WOOD & ROBERTS

BY: George F. Wood

Attorneys for Plaintiff

The defendant may be served
at Robertsdale, Alabama.

Address of Plaintiff's attorney:

510 Van Antwerp Building
Mobile, Alabama

FILED

12-31-54

ALICE J. BUCK, Clerk

STATE OF LOUISIANA)
PARISH OF ORLEANS)

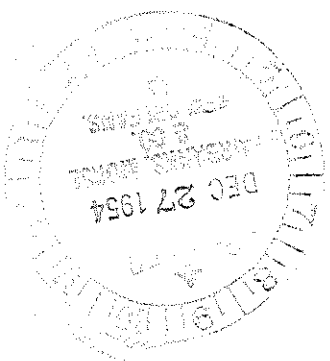
Before me, a Notary Public in and for said Parish in said State, personally appeared Charles R. Even, who is known to me and who, being by me first duly sworn, deposes and says that he is the Manager of the Credit Dept., New Orleans office of Fairbanks, Morse and Company, a corporation, and that he has personal knowledge of the correctness of the annexed statement of account of said corporation against B. B. Larrimore, doing business as Farmers Hardware and Supply Company, and that the same is just, true and correct, and that there is now due from said B. B. Larrimore, doing business as Farmers Hardware and Supply Company to Fairbanks, Morse and Company, \$2,641.28 after allowing all just credits.

Charles R. Even

Subscribed and sworn to before
me this 28th day of December, 1954.

Walter J. Smith
Notary Public

FILED
12-31-54
LISE A. GUY, CLERK



SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }
Baldwin County.

Circuit Court, Baldwin County

No. 2499

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon B. B. LARRIMORE, doing business as Farmers
Hardware & Supply Company

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

B. B. LARRIMORE, doing business as Farmers Hardware & Supply Co. Defendant.

by FAIRBANKS, MORSE & COMPANY, a corporation

Plaintiff

Witness my hand this 1st day of January 1955

Clerk

BOOK 002 PAGE 291

PILLANS, REAMS, TAPPAN, WOOD & ROBERTS

LAWYERS AND PROCTORS

VAN ANTWERP BUILDING

P. O. BOX 935

MOBILE 5, ALABAMA

PALMER PILLANS
W. DEWITT REAMS
JOHN H. TAPPAN
GEORGE F. WOOD
BONNERRAE H. ROBERTS
ALEXANDER F. LANKFORD

December 30, 1954

CABLE ADDRESS: PTAH

Clerk,
Circuit Court of Baldwin County,
Bay Minette, Alabama

Re: Fairbanks, Morse and Company vs.
B. B. Larrimore

Dear Madam:

We enclose herewith two copies of a complaint which
we should like filed and service had.

We also enclose our check in the amount of \$15.00 as
a deposit for costs, Fairbanks, Morse and Company being a
non-resident corporation.

Thank you for your kind attention to this matter.

Very truly yours,

PILLANS, REAMS, TAPPAN, WOOD & ROBERTS

by George F. Wood

GFW:sh
encls.