#### SUMMONS

THE STATE OF ALABAMA, SALDWIN COUNTY.

BOOK 003 PAGE 345

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

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, Alabama, at Bay Minette, against B. B. LARRIMORE, doing business as FARMERS HARDWARE & SUPPLY COMPANY by HANNA PAINT COMPANY, INC.

Witness my hand this the \_\_\_\_\_\_day of February, 1955.

Clerk - ione &

#### 

# COMPLAINT HANNA PAINT COMPANY, INC., PLAINTIFF VS: IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA B. B. LARRIMORE, doing business as FARMERS HARDWARE & SUPPLY COMPANY, DEFENDANT

The plaintiff claims of the defendant ONE THOUSAND SIX HUNDRED FORTY FOUR & 89/100 DOLLARS (\$1,644.89), due from him by account on, to wit: the 22nd day of January, 1954, which sum of money, with interest thereon, is still unpaid.

#### COUNT II:

COUNT I:

The plaintiff claims of the defendant, ONE THOUSAND SIX HUNDRED FORTY FOUR & 89/100 DOLLARS (\$1,644.89), due from him on account stated between the plaintiff and the defendant on, to wit: the 22nd day of January, 1954, which sum of money, with interest thereon, is still unpaid.

#### COUNT III:

The plaintiff claims of the defendant ONE THOUSAND SIX HUNDRED FORTY FOUR & 89/100 DOLLARS (\$1,644.89), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 22nd day of January, 1954, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof and made a part of this cause, 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 1st day of February, 1955.

Attorney for Plaintiff

## STATE OF Habane

My commission expires....

Be it remembered, that on this 1st day of February
A. D., 19. 55 personally appeared before me, the undersigned authority, L. V. Stabler,
known to m
who being duly sworn, upon his oath stated that he is of President, Hanna Paint Co., IncPrincipal place of business, B'ha
solution organized and doing business under the laws of the State of Alabama and has been duly authorized by said corporation to make this affidavit
∫a partnership composed of
a sole trader doing business as
and that as such he makes this affidavit; that he is familiar with the books and business o said . Hanna Paint Co. ; that the attached account agains Farmers Hdw. & Supply Co. of Robertsdale, Ala.
is just and correct, within the knowledge of this affiant, that the items thereon stated and composing the said account were sold and delivered to said. B. B. Larrimore
at { their } special instance and request, that credit has been duly given for all payments and his
just and lawful offsets to which said account is entitled as thereon stated, and that the deplace
thereof, amounting to the sum of <u>Une Thousand-six hundred-forty four &amp; Bollars</u> (\$1,644.89) with interest from <b>NUFRY 22</b> 1957 is justly due and
remains unpaid.
I hereby certify under my official seal that I am authorized as a Notary Public to
administer oaths under the laws of the State of Habana
and that the foregoing was subscribed and sworn to before me on the day and year
first above stated.
Notary Public

10 and 2 and 2 de 1935

doing business as Jarmers

Company TAYLOR WILKING KEN

By Edleigh Steadlems. S.

m2535

### SUMMONS AND COMPLAINT

HANNA PAINT COMPANY, INC.,

PLAINTIFF

VS:

B. B. LARRIMORE, doing business as FARMERS HARDWARE & SUPPLY COMPANY,

DEFENDANT

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW

FEB 7 1955
ALICE J. DUCK, CLERK

FOREST A. CHRISTIAN FOLEY, ALABAMA