

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

May 30, 1955

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

Re: Mobile Steel Company
vs: John J. Phillips
Case No. 2594

Dear Mrs. Duck;

Kindly take file and docket sheet to Judge Hall and have him enter judgment for \$930.02 (\$865.62 principal and \$64.40 interest), and furnish me with certificate of judgment.

Thanking you, I am

Yours very truly,


FOREST A. CHRISTIAN

SUMMONS

BOOK 003 PAGE 364

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon JOHN J. PHILLIPS, doing business as ROBERTSDALE WELDING CO., 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 JOHN J. PHILLIPS, doing business as ROBERTSDALE WELDING CO., by MOBILE STEES COMPANY, INCORPORATED.

Witness my hand this the 14 day of April, 1955.

Alice J. Duck
Clerk

.....

COMPLAINT

MOBILE STEEL COMPANY, INCORPORATED,)

PLAINTIFF)

VS:)

JOHN J. PHILLIPS, doing business as)
ROBERTSDALE, WELDING CO.)

DEFENDANT)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant EIGHT HUNDRED SIXTY FIVE & 62/100 DOLLARS (\$865.62) due from him by account on, to wit: the 9th day of February, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant EIGHT HUNDRED SIXTY FIVE & 62/100 DOLLARS (\$865.62), due from him on account stated between the plaintiff and the defendant on, to wit: the 9th day of February, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant EIGHT HUNDRED SIXTY FIVE & 62/100 DOLLARS (\$865.62), due from for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 9th day of February, 1954, 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 19th day of April, 1955.

James C. Clark
Attorney for Plaintiff

The defendant lives in Robertsdale, Ala.

FILED

April 26, 1955

ALICE J. DUCK, Clerk

COUNTY OF Mobile

SG-188 (1-7-73)

STATE OF Alabama

Be it remembered, that on this 19th day of April
A. D., 1955., personally appeared before me, the undersigned authority,
J.R. Mighell, Jr. known to me
who being duly sworn, upon his oath stated that he is President and Gen Mgr
of Mobile Steel Co., Inc.
{ a corporation 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 Mobile Steel Co., Inc.
and that as such he makes this affidavit; that he is familiar with the books and business of
said Mobile Steel Co., Inc.; that the attached account against
Robertsdale Welding Co. of Robertsdale, Ala.
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
posing the said account were sold and delivered to said Robertsdale Welding Co.
at { its } special instance and request, that credit has been duly given for all payments and
{ their }
{ his }
just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of Eight Hundred Sixty Five & 62/100-----Dollars
(\$ 865.62) with interest from 19 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 Alabama
and that the foregoing was subscribed and sworn to before me on the day and year
first above stated.

Notary Public

County of Mobile State of Alabama
My commission expires May A. D. 1956.

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Received 26 day of April 1955
and on 27 day of April 1955
I served a copy of the within
on _____

By service on John J. Phillips

TAYLOR WILKINS, Sheriff
By Collegio Steadman J. S.

202594

SUMMONS AND COMPLAINT

MOBILE STEEL COMPANY, INCORPORATED
PLAINTIFF

VS:

JOHN J. PHILLIPS, doing business
as ROBERTSDALE WELDING CO.,
DEFENDANT

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

FILED

APR 26 1955

AUGUST DICK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA