

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

September 26, 1955

Hon. H. M. Hall
Judge of Circuit Court
Bay Minette, Alabama

Re: Dearborn Stove Co.

vs: George Ingram, dba, Ingram Electric
Case No. 2706

Dear Judge Hall

Kindly render a Judgment by Default in this case for \$177.75. It is
based on an itemized and verified account.

Yours very truly,

A handwritten signature in dark ink, appearing to read "Forest A. Christian", with a stylized flourish at the end.

FOREST A. CHRISTIAN

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon GEORGE INGRAM, d/b/a Ingram Electric 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 GEORGE INGRAM, d/b/a Ingram Electric Company, by DEARBORN STOVE COMPANY.

Witness my hand this the 24 day of August, 1955.

W. J. Blunt
Clerk

COMPLAINT

DEARBORN STOVE COMPANY,	)	
	)	
PLAINTIFF	)	IN THE CIRCUIT COURT OF
	)	
VS:	)	BALDWIN COUNTY, ALABAMA
	)	
GEORGE INGRAM, d/b/a	)	AT LAW
Ingram Electric Company	)	
	)	
DEFENDANT	)	

COUNT I

The plaintiff claims of the defendant ONE HUNDRED SEVENTY-SEVEN & 75/100 DOLLARS (\$177.75), due from him by account on, to wit: the 9th day of August, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT II

The plaintiff claims of the defendant ONE HUNDRED SEVENTY-SEVEN & 75/100 DOLLARS (\$177.75), due from him on account stated between the plaintiff and the defendant on, to wit: the 9th day of August, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT III

The plaintiff claims of the defendant ONE HUNDRED SEVENTY-SEVEN & 75/100 DOLLARS (\$177.75), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 9th day of August, 1955, 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 9th day of August, 1955.

W. J. Blunt
Attorney for Plaintiff

STATE OF TEXAS

COUNTY OF DALLAS

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BEFORE ME, the undersigned authority, on this day personally appeared C. E. Struwe
who, being by me duly sworn, states on oath that he is (Name of person making affidavit)

1. An individual trading as (Trade style if used—otherwise owner's name)

2. Agent of (Name of firm)

a co-partnership, composed of (Names of partners)

and that he is duly qualified and authorized to make this affidavit.

3. Agent of DEARBORN STOVE CO. (Name of corporation), a corporation,

duly incorporated and existing under and by virtue of the laws of the State of TEXAS

with its principal office and domicile in the City of DALLAS, County

of DALLAS, and State of TEXAS, and

is duly qualified and authorized to make this affidavit.

4. That the foregoing and annexed account, claim, and cause of action in favor of DEARBORN STOVE CO.

and against

Ingram Electric Company, Foley, Alabama

in the sum of One hundred seventy-seven and 75/100 (\$177.75) Dollars
is within knowledge of the affiant just and true, and that it is due and that all just and lawful offsets, payments
and credits have been allowed.

C. E. Struwe, Secretary-Treasurer

SWORN TO AND SUBSCRIBED BEFORE ME, this 9th day of August A. D. 19 55

(Notary Seal)

NOTARY PUBLIC IN AND FOR COUNTY OF
Dallas STATE OF Texas

Received 24 of Aug 1955
and on 25 day of Aug 1955
I served a copy of the within AT C.
on Miss G. Ingram
d/b/a Ingram Electric Co
By service on _____

TAYLOR WILKINS Sheriff
By Forest A. Christian D. S.

No. 2706

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

DEARBORN STOVE COMPANY,

PLAINTIFF

VS:

GEORGE INGRAM, d/b/a
Ingram Electric Company

DEFENDANT

FILED

AUG 24 1955

ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA