	SOUTHERN SHOE COMPANY Plaintiff,	*	IN THE CIRCUIT COURT
		*	OF
	-vs-	*	BALDWIN COUNTY, ALABAMA
	JOHN W. BOYETT, doing business as	*	AT Law. No. 2820.
	ROBERTSDALE SHOE SHOP, Defendant,	*	

Comes the defendant and demies oweing this account in as much as he has offered to return the shoes, in as much as they were placed in his shop, while he was out and unbeknowing to the defendant.

The said defendant has the two (2) cases of shoes to be picked up.

Witness this 6th day of February.

John ud Bufett

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon JOHN W. BOYETT, doing business as ROBERTSDALE SHOE SHOP, to appear and plead, answer or demur, within thirty days from the service hereof, to the fomplaint filed in the Circuit Court of Baldwin County, Alabama, at Bay Minette, against JOHN W. BOYETT, doing business as ROBERTSDALE SHOE SHOP, by SOUTHERN SHOE COMPANY.

Witness my hand this the // day of January, 1956.

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COMPLAINT

SOUTHERN SHOE COMPANY,	2 <u>2</u> 2	
PLAINTIFF	, 2004 2004	IN THE CIRCUIT COURT OF
VS:	\$ 5 3 5	BALDWIN COUNTY, ALABAMA
JOHN W. BOYETT, Doing business a	29 15 - <u>\$</u> \$	AT LAW
ROBERTSDALE SHOE SHOP,	99 99	
DEFENDAL	VT §§	

COUNT I:

The plaintiff claims of the defendant TWO HUNDRED SEVEN & 42/100 DOLLARS (\$207.42), due from him by account on, to wit: the 10th day of June, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant TWO HUNDRED SEVEN & 42/100 DOLLARS (\$207.42), due from him on account stated between the plaintiff and the defendant on, to wit: the 10th day of June, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant TWO HUNDRED SEVEN & 42/100 DOLLARS (\$207.42), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 10th day of June, 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 22nd day of December, 1955.

Mullifully for Plaintiff

STATE OF LOUISIANA
COUNTY OF PARISH OF ORIEANS
Before me, the undersigned authority in and for
aforesaid county and state, as a notary public under my seal of
office, which seal of office is hereto attached, personally appeared
ISADORE COTLAR known to me, who being by me first duly
sworn, deposed and upon his oath stated that he is PARTNER
of <u>SOUTHERN SHOE COMPANY</u> , a corporation organized and doing
business under the laws of; a partnership
composed of ISADORE, JACOB & JOSEPH COTLAR ; a sole trader
doing business as; that as such he
makes this affidavit; that he is familiar with the books and business
of <u>SOUTHERN SHOE COMPANY</u> that the attached account
against ROBERTSDALE SHOE SHOP is just and correct, within
the knowledge of this affiant; that he has authority to make this
affidavit and that he has personal knowledge of the matters contained
herein; that the items thereon stated and composing the said account
were sold and delivered to the said <u>ROBERTSDALE SHOP</u> at the
special instance and request of the debtor and that credit has been
duly given for all payments and just and lawful offsets to which
said account is entitled as thereon stated, and that the balance
TWO HUNDRED SEVEN DOLLARS and 42/100 (\$ 207.42) with thereof, amounting to the sum ofDollars (\$ 207.42)
interest from, 19, is justly due and remains
unpaid.
Ladre Cattar
- padre Cattar
Sworn to, subscribed, acknowledged, signed and sealed before
me, as a notary public under my seal of office, with my seal hereto
affixed on this the 22nd: day of Aleemby, 1900
Janes Donfon
A notary public in and for the
STATE OF COURSE OF THE AIR TOT ONE
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