

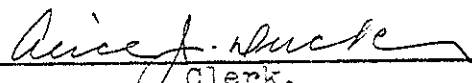
STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon H. R. Hall and Mrs. H. R. Hall to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and thereto answer the complaint of A. Gardberg.

Witness my hand this 20 day of January, 1956.

  
Clerk.

A. GARDBERG,

Plaintiff,

vs.

H. R. HALL and  
MRS. H. R. HALL,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW.

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Three Thousand Six Hundred Fifty-six and 96/100 Dollars (\$3,656.96) due from them by account on the 15th day of May, 1953, which sum of money together with the interest thereon is due and unpaid.

COUNT TWO:

The Plaintiff claims of the Defendants the sum of Three Thousand Six Hundred Fifty-six and 96/100 Dollars (\$3,656.96) due from them on account stated between the Plaintiff and the Defendants on the 15th day of May, 1953, which sum of money together with the interest thereon is due and unpaid.

COUNT THREE:

The Plaintiff claims of the Defendants the sum of Three Thousand Six Hundred Fifty-six and 96/100 Dollars (\$3,656.96) due from them for merchandise, goods and chattels sold by the Plaintiff to the Defendants on, to-wit: from October 30, 1951, to January 10, 1953, on which account the last payment was made May 15, 1953, which

sum of money together with the interest thereon is due and unpaid.

COUNT FOUR:

The Plaintiff claims of the Defendant, H. R. Hall, the sum of Three Thousand Six Hundred Fifty-six and 96/100 Dollars (\$3,656.96) due from him by account on the 15th day of May, 1953, which sum of money together with the interest thereon is due and unpaid.

COUNT FIVE:

The Plaintiff claims of the Defendant, H. R. Hall, the sum of Three Thousand Six Hundred Fifty-six and 96/100 Dollars (\$3,656.96) due from him on account stated between the Plaintiff and the Defendant on the 15th day of May, 1953, which sum of money together with the interest thereon is due and unpaid.

COUNT SIX:

The Plaintiff claims of the Defendant, H. R. Hall, the sum of Three Thousand Six Hundred Fifty-six and 96/100 Dollars (\$3,656.96) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: from October 30, 1951, to January 10, 1953, on which the last payment was made May 15, 1953, which sum of money together with the interest thereon is still due and unpaid.

COUNT SEVEN:

The Plaintiff claims of the Defendant, Mrs. H. R. Hall, the sum of Three Thousand Six Hundred Fifty-six and 96/100 Dollars (\$3,656.96) due from her by account on the 15th day of May, 1953, which sum of money together with the interest thereon is still due and unpaid.

COUNT EIGHT:

The Plaintiff claims of the Defendant, Mrs. H. R. Hall, the sum of Three Thousand Six Hundred Fifty-six and 96/100 Dollars (\$3,656.96) due from her on account stated between the Plaintiff and the Defendant on the 15th day of May, 1953, which sum of money together with the interest thereon is due and unpaid..

COUNT NINE:

The Plaintiff claims of the Defendant, Mrs. H. R. Hall, the sum of Three Thousand Six Hundred Fifty-six and 96/100 Dollars (\$3,656.96) due from her for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: from October 30, 1951, to January 10, 1953, on which account the last payment was made May 15, 1953, which sum of money together with the interest thereon is due and unpaid.

Chas. Stone

Charles Hoffman  
Attorneys for Plaintiff.

Plaintiff demands a trial of  
this cause by jury.

Chas. Stone

Charles Hoffman  
Attorneys for Plaintiff.

A. GARDBERG,

Plaintiff,

vs.

H. R. HALL and  
MRS. H. R. HALL,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

INTERROGATORIES PROPOUNDED BY  
THE PLAINTIFF TO THE DEFENDANTS

Comes now the Plaintiff, A. Gardberg, by his attorneys, an affidavit having been made by John Chason, one of the Attorneys of Record for the Plaintiff, and propounds the following interrogatories to the Defendants, H. R. Hall and Mrs. H. R. Hall, separately and severally:

1. Are you indebted to the Plaintiff for articles purchased by you from him?

2. If your answer to the last interrogatory is yes, please state in what amount you are indebted to the Plaintiff.

3. Did you have an account with the Plaintiff from approximately October 30, 1951, to the date of your last payment on such account?

4. If your answer to the last interrogatory is yes, please state what articles you purchased from him, the cost price of each, and whether you have paid for the same.

5. Did you make a payment on such account on January 8, 1952, and if so, what was the amount of your payment, and was it by check or cash?

(a) If you state that you made such payment by check, please attach to the answers to these interrogatories a copy of such check.

6. Did you make a payment upon your account with the Plaintiff on March 18, 1953, in the sum of One Thousand Five Hundred Dollars?

(a) If you state that you made such payment, was it by cash or by check?

(b) If your answer is that you made such payment by check, please attach to your answers to these interrogatories a copy of such check.

7. Did you make a payment upon your account with the Plaintiff on May 15, 1953, in the sum of Five Hundred Dollars?

(a) If you state that you made such payment, was it by check or by cash?

(b) If you state that such payment was made by check, please attach to your answers to these interrogatories a copy of such check.

8. Have you made any other payments not herein inquired about upon your account with the Plaintiff and if so, state when such payments were made, and the amount of same.

9. Did the Plaintiff refinish your piano on approximately September 30, 1953, at a cost to you of One Hundred Thirteen Dollars and Thirty Cents (\$113.30)?

(a) If your answer to this question is yes, who owned the piano and who authorized the Plaintiff to refinish it?

10. Did you make a purchase from the Plaintiff on January 10, 1953, of certain articles that were to be delivered to you on January 11, 1953, at a cost price of Eighty-four Dollars and Twenty-seven Cents (\$84.27)?

(a) If your answer is yes, when were such articles delivered and were they articles that were necessary for your home?

(b) Have you ever paid for such articles?

11. Were any of the purchases which are the basis for this suit made from the Plaintiff by the Defendant Mrs. H. R. Hall?

(a) If your answer is yes, please state what articles were purchased by Mrs. H. R. Hall.

(b) Did the Defendant H. R. Hall consent to the purchases which were made by Mrs. H. R. Hall?

(c) Were all of the purchases made by Mrs. H. R. Hall necessities for the home?

(d) If you state that all of them were not necessities, please state which purchases were not.

12. If your answer the last interrogatory by stating that any of the purchases were not necessary for the home, and that such purchases were made by Mrs. H. R. Hall, did the Defendant H. R. Hall ever notify the Plaintiff that he would not pay for the same?

13. Did you receive a statement from the Plaintiff dated June 8, 1954, addressed to Mr. Mrs. H. R. Hall, Fairhope, Alabama, which statement showed a balance due of Three Thousand Six Hundred Fifty-six Dollars and Ninety-six Cents (\$3,656.96)?

(a) If you state that you did receive such statement, please attach such statement to your answers to these interrogatories.

(b) If you state that you did not receive that statement, please attach to your answers to these interrogatories any statements of this account that you have received from the plaintiff.

CHASON & STONE

By: 

Attorneys for Plaintiff.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, HARRY M. D'OLIVE, a Notary Public, in and for said County in said State, personally appeared John Chason, who is known to me, and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That his name is John Chason, and that he is one of the Attorneys of Record for A. Gardberg, who is the Plaintiff in that certain action now pending in the Circuit Court of Baldwin County, Alabama, wherein H. R. Hall and Mrs. H. R. Hall are the Defendants. That the answers to the Interrogatories propounded above will be material testimony and evidence for the Plaintiff in the said cause.

Dated this 21<sup>st</sup> day of January, 1956.

Sworn to and subscribed before  
me this 21<sup>st</sup> day of January,  
1956.

HARRY M. D'OLIVE  
Notary Public, Baldwin County, Ala.