

A. H. LISENBY

PLAINTIFF

vs.

JOSEPH H. KEITH

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

LAW SIDE.

NUMBER: 2883

Came the Plaintiff in the above styled cause by Attorney and the Defendant came not but made default and the same being considered by the Court on evidence presented by Attorney for the Plaintiff it is therefore ordered and adjudged that the Plaintiff have and recover of the Defendant the sum of Eight Hundred and Ninety Two and 50/100 (\$892.50) Dollars, the amount claimed in said complaint and proven by the Plaintiff plus interest at the rate of six per-centum per annum from the 29th day of August, 1953 together with the costs in this behalf expended for which execution may issue.

Given under my hand on this the 19th day of June, 1956.

Hubert M. Hall

JUDGE

CIRCUIT COURT BALDWIN COUNTY, ALABAMA.

FRANK G. HORNE
DOUGLAS S. WEBB

Law Offices of
Horne & Webb
Attorneys at Law
Atmore, Ala.

March 23, 1956.

Mrs Alice J. Duck,
Clerk,
Circuit Court,
Baldwin County,
Bay Minette, Alabama.

Dear Mrs Duck:

Enclosed is a complaint we wish filed in your circuit court for A. H. Lisenby against Joseph H. Keith.

It is our information that the defendant resides at Route One, Box 223, Fairhope, Alabama and his telephone number is Waverly 85156.

With kindest personal regards I remain;

Very truly yours,

HORNE & WEBB

BY:



DOUGLAS S. WEBB

DSW/nh

C I R C U I T C O U R T

STATE OF ALABAMA §
BALDWIN COUNTY §

TO: ANY SHERIFF OF THE STATE OF ALABAMA,
GREETINGS:

You are hereby commanded to summons Joseph H. Keith to appear within thirty (30) days from the service of this writ in the Circuit Court of Baldwin County, Alabama to be held for said county at the place of holding same, then and there to answer, plead or demur to the complaint of A. H. Lisenby.

Witness my hand, this 26 day of March 1956.


CLERK.

* * * * *

C O M P L A I N T.

A. H. LISENBY	§	IN THE CIRCUIT COURT OF
PLAINTIFF.	§	BALDWIN COUNTY, ALABAMA.
VS.	§	LAW SIDE.
JOSEPH H. KEITH	§	NUMBER: <u>2883</u> .
DEFENDANT.	§	

COUNT ONE .

The plaintiff claims of the defendant Eight Hundred and Ninety Two and 50/100 (\$892.50) Dollars due by the defendant to the plaintiff on open account on to-wit; the 29th day of August, 1953, which said sum together with the interest thereon is due and unpaid.

COUNT TWO.

The plaintiff claims of the defendant Eight Hundred and Ninety Two and 50/100 (\$892.50) Dollars due by the defendant to the plaintiff for work and labor done by the plaintiff for the defendant on to-wit; from June 25, 1953 to and including August 29, 1953, at defendant's request which sum of money with the interest thereon, is still unpaid and is the property of the plaintiff.

COUNT THREE.

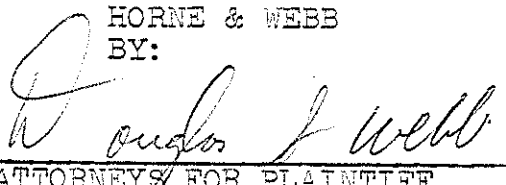
The plaintiff claims of the defendant Eight Hundred and

Ninety Two and 50/100 (\$892.50) Dollars due from him by account stated between the plaintiff and defendant on to-wit; the 29th day of August, 1953, which sum of money with the interest thereon is still unpaid.

COUNT FOUR.

The plaintiff claims of the defendant Eight Hundred and Ninety Two and 50/100 (\$892.50) Dollars due from him for money on to-wit; the 27th day of February, 1956 received by the defendant to the use of the plaintiff which sum of money with the interest thereon, is still unpaid.

HORNE & WEBB
BY:


ATTORNEYS FOR PLAINTIFF.

The plaintiff has attached to the original summons and complaint in this cause a verified, itemized statement of account and gives notice that the same will be used in evidence on the trial of this cause.

HORNE & WEBB
BY:


ATTORNEYS FOR PLAINTIFF.

2883

ved 26 day of April 1956
n 3 day of April 1956
ed a copy of the within Joe
Joseph H. Keith
vice on

TAYLOR WILKINS, Sheriff

By Childress D. S.

Barnwell

Sheriff claims 10.0 miles at

Ten Cents per mile Total \$ 1.00

TAYLOR WILKINS, Sheriff

BY Childress
DEPUTY SHERIFF

RECORDED

FILED

MAR 26 1956

ALICE J. BUCK, Clerk

Law Offices of
Horne & Webb
Attorneys at Law