

McDERMOTT & PFLEGER

ATTORNEYS AT LAW  
304-306 STAPLES-PAKE BUILDING  
MOBILE, ALABAMA

WM. V. McDERMOTT  
SYDNEY S. PFLEGER

August 9, 1956

3001

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

Dear Mrs. Duck:

I am enclosing herewith an original and copy of the complaint against Lee Caloway and in favor of the Surrette Storage Battery Company, Inc. The Defendant's address in in the lower left hand corner of the complaint. Please file the same for us.

Your courtesy in the matter is more than appreciated.

Very truly yours,

McDERMOTT & PFLEGER

BY: 

SSP:nh

Encl:

SURRETTE STORAGE BATTERY COMPANY,  
INC., A Corporation, as assignee of  
Geoffrey Chapman, individually and  
doing business as Chapman Electric  
Company,

Plaintiff,

versus

LEE CALOWAY, individually and doing  
business as the Gulf Lagoon Fish  
Company,

Defendant.

) IN THE CIRCUIT COURT  
) OF BALDWIN COUNTY,  
) BAY MINETTE, ALABAMA.  
)  
) CASE NO. \_\_\_\_\_

COUNT ONE

Plaintiff claims of the Defendant the Sum of Four Hundred Nine and 57/100 Dollars (\$409.57), due from him by account on the 21st day of May, 1956, which sum of money with interest thereon from to-wit the 21st day of May, 1956, is still due and unpaid.

COUNT TWO

Plaintiff claims of the Defendant the Sum of Four Hundred Nine and 57/100 Dollars (\$409.57), due from him for merchandise, goods and chattel sold by the Plaintiff to the Defendant on to-wit the 29th day of September, 1955, and the 21st day of April, 1956, which sum of money with interest thereon from the 21st day of May, 1956, is still due and unpaid.

COUNT THREE

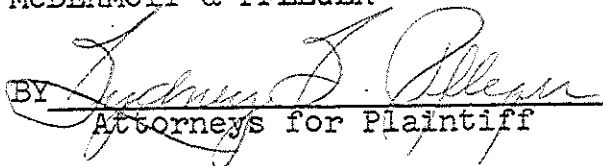
Plaintiff claims of the Defendant the sum of Two Hundred Thirty-nine and 62/100 Dollars (\$239.62), due from him for four (4) Surrrette batteries purchased by the Defendant from the Plaintiff on to-wit the 29th day of September, 1955, and which merchandise was delivered to the Defendant by the Plaintiff and which sum of money with interest thereon from to-wit the 29th day of September, 1955, is still due and unpaid.

COUNT FOUR

Plaintiff claims of the Defendant the Sum of One Hundred Sixty-nine and 95/100 Dollars (\$169.95), due from him for three (3) Surrrette batteries purchased by the Defendant from the Plaintiff on to-wit the 21st day of April, 1956, and which merchandise was delivered to the Defendant by the Plaintiff and which sum of money with interest thereon from to-wit the 29th day of September, 1955, is still due and unpaid.

McDERMOTT & PFLEGER

Defendant's address:  
Gulf Lagoon Fish Company  
Gulf Shores, Alabama

BY   
Attorneys for Plaintiff

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 3001

August

TERM, 19 56

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

LEE CALOWAY, ind. d/b/a GULF LAGOON FISH 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, State of Alabama, at Bay Minette, against

LEE CALOWAY, Ind. d/b/a GULF LAGOON FISH COMPANY

, Defendant.

by SURRETTE STORAGE BATTERY COMPANY INC., A Corporation, as assigness of Geoffrey (Chapman)  
Chapman, ind. and doing business as Chapman Electric Company,  
, Plaintiff.

Witness my hand this 10th. day of August 19 56

Alice J. Danks

, Clerk