

WALTER E. PETERSON, JR., d/b/a  
"SURE GROW",

PLAINTIFF

VS

ERNEST TAYLOR,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes the defendant in the above styled cause and answering plaintiff's complaint and each and every count thereof separately and severally says:

One. The matters therein alleged are untrue.

Two. That he has paid the account sued on.

BEEBE & SWEARINGEN

BY W. C. Beebe  
Attorneys for defendant

The defendant demands a trial by jury.

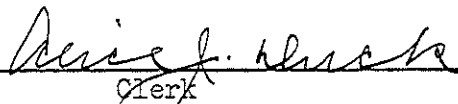
SUMMONS

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon ERNEST TAYLOR, 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 ERNEST TAYLOR, by WALTER E. PETERSON, JR., d/b/a "SURE GROW".

Witness my hand this the 29 day of August, 1956.

  
Clerk

COMPLAINT

WALTER E. PETERSON, JR., d/b/a )  
"SURE GROW", )  
PLAINTIFF )  
VS: )  
ERNEST TAYLOR, )  
DEFENDANT )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COUNT I

The plaintiff claims of the defendant FOUR HUNDRED EIGHTY-THREE & 46/100 DOLLARS (\$483.46), due from him by account on, to wit: the 23rd day of May, 1956, which sum of money, with interest thereon, is still unpaid.

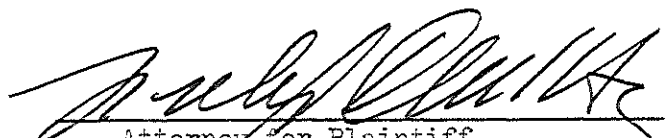
COUNT II

The plaintiff claims of the defendant FOUR HUNDRED EIGHTY-THREE & 46/100 DOLLARS (\$483.46), due from him on account stated between the plaintiff and the defendant on, to wit: the 23rd day of May, 1956, which sum of money, with interest thereon, is still unpaid.

COUNT III

The plaintiff claims of the defendant FOUR HUNDRED EIGHTY-THREE & 46/100 DOLLARS (\$483.46), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 23rd day of May, 1956, 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 25th day of August, 1956.

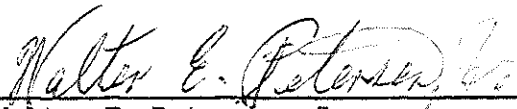
  
Attorney for Plaintiff

The Defendant lives at Loxley, Alabama

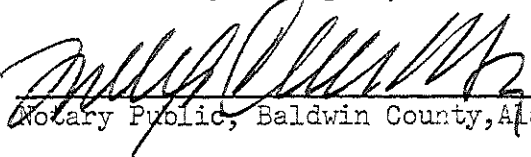
STATE OF ALABAMA, )  
 )  
BALDWIN COUNTY. )

I, WALTER E. PETERSON, JR., FIRST BEING DULY SWORN, DEPOSE  
AND SAY AS FOLLOWS:

My name is Walter E. Peterson, Jr. I was owner and manager of "SURE GROW", liquid fertilizer, and I know to my personal knowledge that I delivered to Ernest Taylor of Loxley, Alabama, "SURE GROW" during the crop season of 1955, which "SURE GROW" had a value of FOUR HUNDRED EIGHTY THREE & 46/100 DOLLARS (\$483.46); and that Ernest Taylor has never disputed said claim. This is a just debt and is the amount due after allowing all just credits.

  
Walter E. Peterson, Jr.

Sworn to and subscribed before me  
this 25th day of August, 1956.

  
Notary Public, Baldwin County, Ala.

Received 29 day of Aug 1956  
and on 10 day of Sept 1956  
I served a copy of the within S & C  
on Ernest Taylor

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Elleigh Stedman D. S.

14. mi West Foley

Sheriff claims 48 miles at  
Ten Cents per mile Total \$ 4.80  
TAYLOR WILKINS, Sheriff  
BY \_\_\_\_\_  
DEPUTY SHERIFF

Lofley

W1 3017

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

WALTER E. PETERSON, JR., d/b/a  
"SURE GROW",

PLAINTIFF

VS:

ERNEST TAYLOR,

DEFENDANT

FILED  
AUG 29 1956  
JULIE L. BUCK, Clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA