

LAW OFFICES
E. G. RICKARBY

P. O. BOX 71

BANK BUILDING

FAIRHOPE, ALABAMA

October 10, 1956

3055

Mrs. Alice Duck
Clerk of Circuit Court
Bay Minette, Alabama

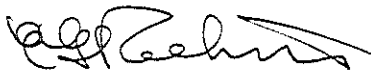
Dear Mrs. Duck:

Inre: Hand vs Mathis
Our File: 3860

With this we are sending you Summons and Complaint
in the suit of Hand vs. Mathis.

Please process and oblige.

Yours very truly,



EGR/ts
10-20-56
Encl.
cc: Mrs. Hand

ETHEL R. HAND,

PLAINTIFF

VS.

JOSEPH V. MATHIS,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant TWO HUNDRED AND FIFTY-THREE DOLLARS AND FIFTEEN CENTS (\$253.15) due from him by account on, to-wit, the 29th day of February, 1956, which sum of money with interest thereon is still unpaid.

COUNT II

The Plaintiff claims of the Defendant TWO HUNDRED AND FIFTY-THREE DOLLARS AND FIFTEEN CENTS (\$253.15) due from him on accounts due between the Plaintiff and Defendant on, to-wit, the 29th day of February 1956, which sum of money with interest thereon is still unpaid.


E. G. RICKARBY,
Attorney for Plaintiff

NOTE: The account sued on is evidenced by an itemized and verified statement filed herewith.


E. G. RICKARBY,
Attorney for Plaintiff

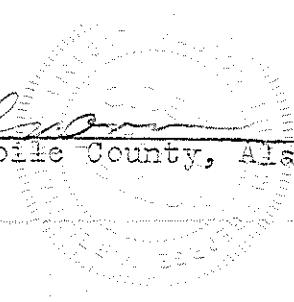
STATE OF ALABAMA,
MOBILE COUNTY.

Before me George M. Bellman a Notary
Public in and for said county in said state personally appear-
ed ETHEL R. HAND, who being first duly sworn, deposes and
says that the attached itemized account correctly shows the
account owing by the said JOSEPH V. MATHIS to the Affiant,
and that said Affiant has knowledge of the correctness of
said account.

Ethel R. Hand
ETHEL R. HAND,
Affiant.

Sworn to and subscribed before me on this the 9th day of
October, 1956.

George M. Bellman
Notary Public, Mobile County, Ala.

A circular notary seal for George M. Bellman, Notary Public, Mobile County, Alabama. The seal contains the text "NOTARY PUBLIC", "MOBILE COUNTY, ALA.", and "GEORGE M. BELLMAN".

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOSEPH V. MATHIS

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 JOSEPH V.
MATHIS
_____, Defendant.

by ETHEL R. HAND

_____, Plaintiff.

Witness my hand this 11th day of Oct 1956

Alice J. Hand, Clerk

ETHEL R. HAND,
PLAINTIFF

VS.

JOSEPH V. MATHIS,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

3355

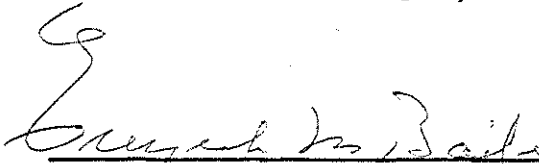
P L E A S

Now comes the Defendant in the above styled cause and for answer to the Bill of Complaint and to each count thereof, separately and severally, states:

1. The Defendant, for answer to Count I of the Bill of Complaint, says that he is not guilty of the matters alleged therein.

2. The Defendant, for answer to Count II of the Bill of Complaint, says that he is not guilty of the matters alleged therein.

3. The Defendant, for answer to the Bill of Complaint and to each count thereof, separately and severally, says that he has paid the debt, for the recovery of which this suit was brought, before the action was commenced.


Attorney for Defendant