

COPY

FOREST A. CHRISTIAN
ATTORNEY AT LAW
FOLEY, ALABAMA

December 27, 1956

3099

Hon. Taylor Wilkins, Sheriff
Baldwin County
Bay Minette, Alabama

Re: Moore-Handley Hardware Co., Inc.
vs: Hawco Ditching & Construction Co., Inc.
No. 7359

Dear Taylor,

Kindly have Carlisle serve G. W. White, Jr., who resides
at Magnolia Springs, Alabama at least on week-end, as an officer
for the above corporation. If he needs more information please
have him see me.

Yours very truly,

FOREST A. CHRISTIAN

SUMMONS

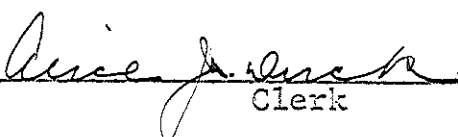
THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon HAWCO DITCHING & CONSTRUCTION COMPANY, INC., to appear and plead, answer or demur, within thirty days from the service of this summons, to the complaint filed in the Circuit Court of Baldwin County, Alabama, at Bay Minette, against HAWCO DITCHING & CONSTRUCTION COMPANY, INC. by MOORE-HANDLEY HARDWARE COMPANY, INC., an Alabama Corporation.

Witness my hand this the 20 day of November, 1956.


Clerk

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COMPLAINT

MOORE-HANDLEY HARDWARE COMPANY,)
INC., AN ALABAMA CORPORATION)

PLAINTIFF)

VS:)

HAWCO DITCHING & CONSTRUCTION)
COMPANY, INC.,)

DEFENDANT)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant ONE THOUSAND TWO HUNDRED FORTY FIVE & 40/100 DOLLARS (\$1,245.40), due from him on account, to wit: the 19th day of October, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE THOUSAND TWO HUNDRED FORTY FIVE & 40/100 DOLLARS (\$1,245.40), due from him on account stated between the plaintiff and the defendant on, to wit: the 19th day of October, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the defendant ONE THOUSAND TWO HUNDRED FORTY FIVE & 40/100 DOLLARS (\$1,245.40), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant, on, to wit: the 19th day of October, 1955, 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 15th day of November, 1956.



Attorney for Plaintiff

and on 27 day of May 1957
I served a copy of the within S. & C.
on Hamco Ditching and
Constructing Co.
By service on W.B. White, Gen.
M. W. Morgan & Co.
TAYLOR WILKINS, Sheriff
By Childress D. S.

Foley

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY Childress
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

MOORE-HANDLEY HARDWARE COMPANY
INC., AN ALABAMA CORPORATION,

PLAINTIFF

VS:

HAWCO DITCHING & CONSTRUCTION
COMPANY, INC.,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED
NOV 20 1956
ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA