

3/100

BALDWIN COUNTY. )

You are hereby commanded to summon B. B. CHAVERS, 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, Alabama against B. B. CHAVERS by FOLEY MOTOR COMPANY.

Witness my hand this the 24<sup>th</sup> day of November, 1956.

Alfred. Buck  
Clerk

CC

FOLEY MOTOR COMPANY,  
PLAINTIFF  
VS:  
B. B. CHAVERS,  
DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COUNT I:

The plaintiff claims of the defendant ONE HUNDRED THIRTY TWO & 39/100 DOLLARS (\$132.39), due from him by account on, to wit: the 1st day of June, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE HUNDRED THIRTY TWO & 39/100 DOLLARS (\$132.39), due from him on account stated between the plaintiff and the defendant on, to wit: the 1st day of June, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE HUNDRED THIRTY TWO & 39/100 DOLLARS (\$132.39), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 1st day of June, 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 23rd day of November, 1956.

Defendant's address is  
Foley, Alabama.

John C. H. 1/12  
Attorney for Plaintiff

Mo. 3100

Received 24 day of Nov. 1956  
and on 20 day of Nov. 1957  
I served a copy of the within A. V. C.  
on B. B. Chavers

By service on \_\_\_\_\_  
TAYLOR WILKINS, Sheriff  
By D. B. Chavers D. S.

*Foley*

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

SUMMONS AND COMPLAINT

FOLEY MOTOR COMPANY,  
PLAINTIFF

VS:

B. B. CHAVERS,  
DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

FILED  
NOV 24 1956  
MISS E. BROWN, CLERK