

SUMMONS

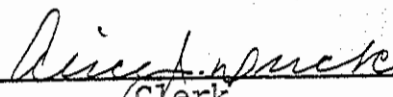
THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon SIMMONS,
doing business as SIMMONS FEED & SEED STORE, 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 SIMMONS, doing business
as SIMMONS FEED & SEED STORE, by McGOWIN-LYONS HARDWARE & SUPPLY CO.

Witness my hand this the 20 day of February, 1957.


Clerk

COMPLAINT

McGOWIN-LYONS HARDWARE
& SUPPLY CO.,

PLAINTIFF

VS:

SIMMONS,
doing business as
SIMMONS FEED & SEED STORE,

DEFENDANT,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant ONE HUNDRED TEN & 67/100 DOLLARS (\$110.67), due from him by account on, to wit: the 6th day of June, 1956, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE HUNDRED TEN & 67/100 DOLLARS (\$110.67), due from him on account stated between the plaintiff and the defendant on, to wit: the 6th day of June, 1956, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE HUNDRED TEN & 67/100 DOLLARS (\$110.67), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 6th day of June, 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 7th day of February, 1957.

Defendant's address is
Fairhope, Alabama.


Attorney for Plaintiff

INVOICE

McGOWIN LYONS HARDWARE & SUPPLY CO.

TELEPHONE
HE MLOCK 2-8721
P. O. BOX 1209

WATER AT ST. LOUIS STREET
WATER AT ST. LOUIS STREET
MOBILE 7, ALABAMA

CABLE ADDRESS
"HUSTLERS"
"HUSTLERS"

SOLD TO SIMMONS FEED & SEED STORE
FAIRHOPE, ALA.

DATE 6/12/56

INVOICE No. 16091-92

YOUR ORDER No.

REQUISITION No.

SHIP TO

TERMS

GOODS MUST NOT BE RETURNED FOR CREDIT WITHOUT PERMISSION

1/3	DOZ. #RHLSC 14 GARDEN RAKES	17.76	5.92
	DOZ. #BRF22 LEAF RAKES	14.76	7.38
1/3	DOZ. #RHC 6 GARDEN HOE	19.20	6.40
1/3	DOZ. #RHC 7 DITTO	19.68	6.56
1/3	DOZ. #LGS42 SHOVEL	25.56	8.52
1/3	DOZ. #DH SQ. PT. RAZOR BACK SHADE	30.84	10.28
1/3	DOZ. #150 PRUNING SHEAR	3.00	12.00
1/3	DOZ. #TD HEDGE SHEAR	2.83	11.32
1/3	DOZ. #GT 50 GARDEN TROWELS	6.36	6.36
2	#9A HUDSON SPRAYER	7.23	14.26
	DOZ. #801 BRASS WASHBOARDS	12.50	6.25
	DOZ. #862 GLASS DITTO	12.95	6.48

110.67

70,315-0
RECORDED

Received 20 day of Feb. 1957
and on 4 day of March 1957
I served a copy of the within S/C.
on Simmons (dba - Feed & Seed
Store -
By service on Willie Simmons

TAYLOR WILKINS, Sheriff
By Edna A. Williams D. S.

Fairhope

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Edna
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

McGOWIN-LYONS HARDWARE & SUPPLY
CO.

PLAINTIFF

VS:

SIMMONS, doing
business as SIMMONS FEED &
SEED STORE,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED
FEB 20 1957
MILICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

McGOWIN-LYONS HARDWARE
& SUPPLY CO.,

Plaintiff,

vs.

SIMMONS,
doing business as
SIMMONS FEED & SEED STORE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

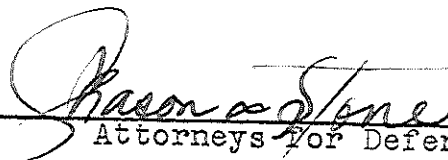
AT LAW

Comes the Defendant in the above styled cause and demurs to the complaint filed in said cause and each and every count thereof, separately and severally, and assigns the following separate and several grounds, viz:

1. That it does not appear from said complaint the name of the Defendant who is being sued.

2. That said complaint does not state a cause of action against anyone.

3. That such complaint alleges that there is attached an itemized statement of the account but no such statement is attached to the complaint which was served upon the Defendant.



Attorneys for Defendant

RECORDED

McGOWIN-LYONS HARDWARE
& SUPPLY CO.,

Plaintiff,

vs.

SIMMONS,
doing business as
SIMMONS FEED & SEED STORE,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

MAR 13 1957

ALICE L. BUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA