

COMPLAINT

Panther Oil & Grease)
Manufacturing Company,)
a corporation)
Plaintiff)
VS.)
John J. Hons)
Defendant)

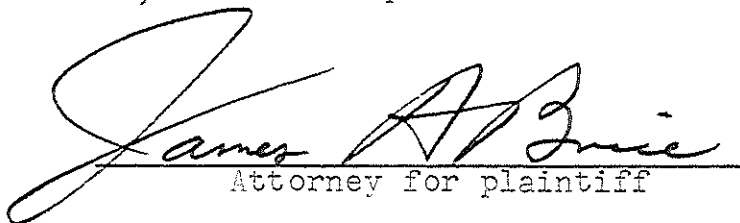
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE:

The plaintiff claims of the defendant One Hundred Six
& 25/100 (\$106.25) Dollars, due from him on account, to
wit: the 21st day of December, 1954, which sum of money,
with interest thereon, is still unpaid.

COUNT TWO:

The plaintiff claims of the defendant One Hundred Six
& 25/100 (\$106.25) Dollars, due from him for merchandise,
goods and chattels sold by the plaintiff to the defendant
on to wit: the 21st day of December, 1954, which sum of
money, with interest thereon, is still unpaid.


Attorney for plaintiff

There is attached to the original and copy hereof, an
itemized statement of account verified by affidavit of
Harold Winborne, a competent witness, sworn to before a
notary public, which statement shows the amount due on
this account as of the 21st day of December, 1954, and
due at present.

Mr. John J. Hons resides in the vicinity of Summerdale,
Alabama.

John J Hons

(Debtor)

Summerdale, Ala.

(Address)

IN ACCOUNT WITH
PANTHER OIL & GREASE MFG. CO.
Fort Worth, Texas
(Creditor)

INVOICE NO.	INVOICE DATE	ITEMIZED STATEMENT	UNIT PRICE	TOTAL
#6016	12-21-54	5-5 PANTHER Alum Roof Coating 1 Brush NC	4.250	106.25
				\$106.25

THE STATE OF TEXAS)
COUNTY OF TARRANT) ss AFFIDAVIT TO ITEMIZED ACCOUNT

Before me, the undersigned authority, a Notary Public in and for Tarrant County, Texas, on this day personally appeared Harold Winborne known to me to be the person whose name is subscribed hereto, and a resident of Tarrant County, Texas, who being by me duly sworn, states an oath that he is Asst. Credit Manager for Panther Oil & Grease Mfg. Co., a corporation organized under and existing by virtue of the laws of the State of Texas, domiciled and doing business with offices in the City of Fort Worth, County of Tarrant, and State of Texas, and as such is familiar with the records and accounts of said corporation, and that the foregoing and annexed account for the sum of One hundred six dollars and 25/100 Dollars, (\$106.25), is to the best of the knowledge and belief of said affiant, just and true; that it is unpaid and that all just and lawful offsets, payments, and credits have been allowed.

Harold Winborne
HAROLD WINBORNE, Asst. Credit Mgr.

Subscribed and sworn to before me, the 7 day of January
A. D. 19 57.

My Commission expires
June 1, 19 59.

M. B. Clark
(Notary Public in and for Tarrant
County, Texas.)

FEB 25 1957

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 John J. Hons

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 John J. Hons

-----, Defendant-----

by Panther Oil & Grease Manufacturing Company, a corporation

-----, Plaintiff-----

Witness my hand this 1st day of March 1957

Alvin A. Smith-----, Clerk

COMPLAINT

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Manufacturing Company,
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VS.

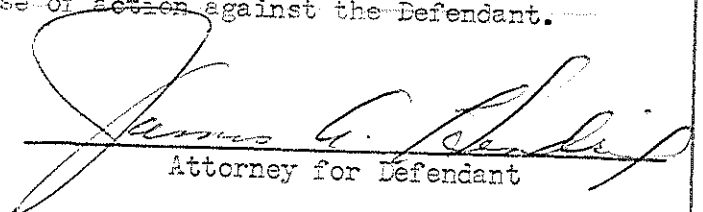
John J. Hons,
Defendant.

IN THE CIRCUIT COURT OF
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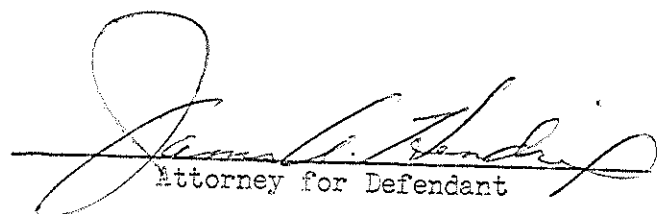
DEMURERS

Comes now the defendant in the above styled cause and demurs to the complaint, and separately and severally to each count thereof, and for grounds of demurer, assigns, separately and severally the following:

1. Said Count states no cause of action against the Defendant.


Attorney for Defendant

Defendant demands a trial by Jury.


Attorney for Defendant

FILED
JAN 10 1917
BALDWIN COUNTY
ALABAMA