SUMMONS

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THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon E. M. CAMPBELL, 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, against E. M. CAMPBELL by JOE LONG.

Witness my hand this the / day of September, 1957.

Clerk J. Duck

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COMPLAINT

JOE LONG,)					
	PLAINTIFF)	IN	THE	CIRCUIT	COURT	OF
VS:		>	BAL	DWIN	COUNTY,	ALAB	AMA
E. M. CAMPBELI	-)	 		AT LAW		
•	DEFENDANT)					

COUNT I:

The plaintiff claims of the defendant THREE HUNDRED SIXTY SEVEN & 04/100 DOLLARS (\$367.04), due from him by account on, to wit: the 9th day of February, 1957, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant THREE HUNDRED SIXTY SEVEN & 04/100 DOLLARS (\$367.04), due from him on account stated between the plaintiff and the defendant on, to wit: the 9th day of February, 1957, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant THREE HUNDRED SIXTY SEVEN & 04/100 DOLLARS (\$367.04), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 9th day of Eebruary, 1957, 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 September, 1957.

Defendant lives North of Pine Rest Cemetery, near Dr. W. S. Beesley place, Foley, Alabama.

Attorney for Plaintiff

AFFIDAVIT OF JOE LONG

THE STATE OF ALABAMA,)
BALDWINCOUNTY.

JOE LONG first being duly sworn, deposes and says as follows:

My name is Joe Long and I run a grocery store at Summerdale,

Alabama, and the attached itemized statement for groceries purchased
by E. M. Campbell, Route, Foley, Alabama, is true and correct. The

balance due on September 23, 1957, is THREE HUNDRED SIXTY SEVEN &

04/100 DOLLARS (\$367.04), after allowing all just credits.

Joe Long

Sworn to and subscribed before me this the 23rd day of September,

1957.

Notary Public

VS: served a copy of the within S and on Landay of Me Ten Contsition mile for TAVIOR WILKING Second chapman 24 By service on

SUMMONS AND COMPLAINT

JOE LONG,

PLAINTIFF

E. M. CAMPBELL,

DEFENDANT

BALDWIN COUNTY, ALABAMA IN THE CIRCUIT COURT OF AT I.AW

HOREST A. CHRISTIAN FOLEY, ALABAMA

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