

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are commanded to summon JOHNNY LONGMIRE, 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 JOHNNY LONGMIRE by WALTER PETERSEN, JR., doing business as SURE-GROW.

Witness my hand this the 8th day of October, 1957.


Clerk

%%%%%%%%%

COMPLAINT

WALTER PETERSEN, JR.,)
doing business as SURE-GROW,)

PLAINTIFF)

VS:)

JOHNNY LONGMIRE,)

DEFENDANT)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant TWO HUNDRED EIGHTEEN & 85/100 DOLLARS (\$218.85), due from him by account on, to wit: the 2nd day of July, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT II:

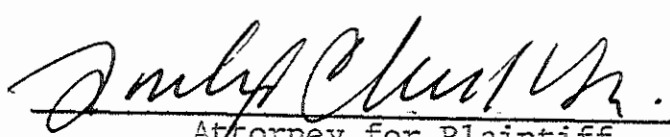
The plaintiff claims of the defendant TWO HUNDRED EIGHTEEN & 85/100 DOLLARS (\$218.85), due from him on account stated between the plaintiff and the defendant on, to wit: the 2nd day of July, 1955, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant TWO HUNDRED EIGHTEEN & 85/100 DOLLARS (\$218.85), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 2nd day of July, 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 3rd day of October, 1957.

Defendant's address is
Belforest, Daphne, Ala.


Attorney for Plaintiff

Received 4 days Oct 1957
and on 28 day of Oct 1957

I served a copy of this within 5/e
on Johnny Longmire

By service on _____

TAYLOR WILKINS, Sheriff
By Edleigh Steadham, S.

Daphne, Ala.

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40
TAYLOR WILKINS, Sheriff

BY Steadham
DEPUTY SHERIFF

5947
RECORDED

SUMMONS AND COMPLAINT

WALTER PETERSEN, JR., doing
business as SURE-GROW,

PLAINTIFF

VS:

JOHNNY LONGMIRE,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW
FILED
OCT 8 1957
ALICE A. ROCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

WALTER PETERSEN, JR.
doing business as
SURE-GROW,

Plaintiff,

vs.

JOHNNY LONGMIRE,

Defendant.

X

X

X

X

X

X

X


IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes the Defendant in the above styled cause and for
plea to the complaint filed in said cause and to each and every count
thereof, separately and severally, says:

1. That the allegations of the complaint are untrue.


Attorneys for Defendant

Defendant demands a trial of
this cause by jury.


Attorneys for Defendant

RECORDED

3349

PLEA

WALTER PETERSEN, JR.,
doing business as
SURE-GROW,

Plaintiff,

VS.

JOHNNY LONGMIRE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED
NOV 25 1957
ALICE J. DUCK, Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

March 21, 1960

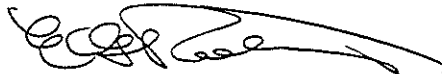
Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Hallett
Vs: Mosley
File: 4028

With this we are sending you \$58.60,
the cost in the Hallett/Mosley case,
that is 3249 and 3249½. Please recall
execution and mark "claim satisfied".

Yours very truly,



EGR/bs
Enclosure
cc: dup. Dun & Bradstreet, Inc.

3349

*Carroll
Gandy*

file