

CRAFT CO. INCORPORATED  
A Corporation

Plaintiff

-VS-

ANTHONY P. BETSIARAS  
Ind. and d/b/a TOWN  
AND COUNTRY CAFE.

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

3497

COUNT ONE:

Plaintiff claims of the Defendant, the sum of ELEVEN HUNDRED EIGHTY FOUR and 65/100 (\$1184.65) DOLLARS, due from him by account on the 1st day of April, 1958, which sum of money with the interest thereon, is still unpaid.

COUNT TWO:

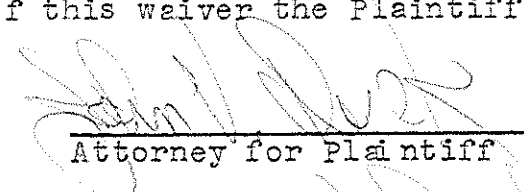
Plaintiff claims of the Defendant, the sum of ELEVEN HUNDRED EIGHTY FOUR and 65/100 (\$1184.65) DOLLARS, for work and labor done for the Defendant by the Plaintiff from on to-wit; the 1st day of May, 1957, until on to-wit; the 1st day of April, 1958, at his request, which sum of money, with the interest thereon, is still unpaid.

COUNT THREE:

Plaintiff claims of the Defendant the sum of FIVE HUNDRED TWENTY ONE and 62/100 (\$521.62) DOLLARS, due by Promissory Note by him on the 27th day of May, 1957, and payable on the 27th day of March, 1958, with interest thereon.

The Plaintiff avers that in, by and as a part of said note the Defendant agreed to pay all costs of collecting, or securing or attempting to collect or secure such debt, including a reasonable Attorney's fee whether the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant the further and additional sum of ONE HUNDRED FORTY DOLLARS (\$140.00) DOLLARS, as a reasonable Attorney's fee.

Plaintiff further avers that in, by and as a part of said note the Defendant waived as to this debt or any renewal thereof, all rights to exemption under the Constitution and Laws of Alabama as to Personal Property and of this waiver the Plaintiff now claims the benefit.

  
Attorney for Plaintiff

Note: The account sued on is hereby evidenced by an itemized and verified statement of the account.

ATTY. FOR PLAINTIFF

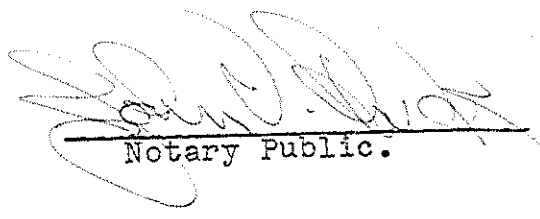
STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in said County in said State, personally appeared before me, Erwin P. Craft, who being by me first duly sworn that he is President of Craft Co., Incorporated, and that he has personal knowledge of the facts herein stated, and that the attached account is a true and correct statement of the account owed by Anthony P. Betsiaras to Craft Co. Inc.

Sworn to and subscribed before me on this the 8th day of

April, 1958.

  
Notary Public.

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 ANTHONY P. BETSIARAS IND. and d/b/a

TOWN AND COUNTRY CAFE

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 ANTHONY P. BETSIARAS

IND. AND ~~D/B/A~~ TOWN AND COUNTRY CAFE-----, Defendant-----

by CRAFT CO. INCORPORATED a Corporation-----

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

Witness my hand this 8th day of April 1958

*Alice J. Duck*  
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Alice J. Duck, Clerk