

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon J. W. CLEMMONS, JR., Individually, and doing business as STAPLETON AUTO REPAIR, 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 J. W. CLEMMONS, Individually, and doing business as STAPLETON AUTO REPAIR by THE BOWMAN PRODUCTS CO.

Witness my hand this the 14 day of April, 1958.

Reice J. ...
Clerk

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COMPLAINT

THE BOWMAN PRODUCTS CO.,)
)
)
PLAINTIFF)
)
VS:)
)
J. W. CLEMMONS, JR.,)
INDIVIDUALLY, AND DOING)
BUSINESS AS STAPLETON)
AUTO REPAIR,)
)
DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW
3511

COUNT I:

The plaintiff claims of the defendant TWO HUNDRED THIRTEEN & 42/100 DOLLARS (\$213.42), due from him by account on, to wit: the 4th day of December, 1956, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant TWO HUNDRED THIRTEEN & 42/100 DOLLARS (\$213.42), due from him on account stated between the plaintiff and the defendant on, to wit: the 4th day of December, 1956, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant TWO HUNDRED THIRTEEN & 42/100 DOLLARS (\$213.42), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 4th day of December 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 19th day of March, 1958.

Paul ...
Attorney for Plaintiff

Received _____ day of _____ 19____
and on 15 day of April 1958

I served a copy of the within J & C

on _____

By service on J. W. Clemmons

TAYLOR WILKINS, Sheriff

By [Signature] D. S.

[Signature]

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY [Signature]
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

THE BOWMAN PRODUCTS CO.,

PLAINTIFF

VS:

J. W. CLEMMONS, JR., INDIVID-
UALLY, AND DOING BUSINESS AS
STAPLETON AUTO REPAIR,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

APR 14 1958

ALICE L. BUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA