

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon HILLIARD JENKINS and AMELIA JENKINS, 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 the place of holding same by GULF TELEPHONE CO., INC. AN ALABAMA CORPORATION.

Witness my hand this the 25 day of April, 1958.

Henry J. Rusk
Clerk

CC

COMPLAINT

GULF TELEPHONE CO. INC.,
PLAINTIFF

VS:

HILLIARD JENKINS and
AMELIA JENKINS
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT I:

The plaintiff claims of the defendant THREE HUNDRED TWENTY four & 93/100 DOLLARS (\$324.93), due from him by account on, to wit: the 8th day of January, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant THREE HUNDRED TWENTY four & 93/100 DOLLARS (\$324.93), due from him on account stated between the plaintiff and the defendant on, to wit: the 8th day of January, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant THREE HUNDRED TWENTY four & 93/100 DOLLARS (\$324.93), due from him for merchandise, goods, and chattels sold by the plaintiff to the defendant on, to wit: the 8th day of January, 1958, 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 8th day of January, 1958.

The defendant's address is:
Loxley, Alabama

Paul H. Smith
Attorney for Plaintiff

Filed on 9 day of May 1958
served a copy of the within Complaint
on Hilliard Jenkins, Amelia
Jenkins

by service on _____

RECORDED

COMPLAINT

TAYLOR WILKINS, Sheriff

By Edw. Stallons

GULF TELEPHONE CO., INC.

VS:

HILLIARD JENKINS and
AMELIA JENKINS

Loyley, Ala

Sheriff claims 8 miles at

Ten Cents per mile Total \$ 8.00

TAYLOR WILKINS, Sheriff

BY Stallons
DEPUTY SHERIFF

FILED

APR 25 1958

NOT L. 1024 001

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

June 7, 1958

Honorable H.M. Hall
Circuit Judge
Bay Minette, Alabama

Re: Gulf Telephone Co.
vs: Hilliard Jenkins
Case No. 3522

Dear Judge:

Kindly render a judgment in this case based on an itemized statement of account in the amount of \$331.50 which includes \$7.57 interest.

Cordially yours,


FOREST A. CHRISTIAN