

3565

EMMETTE BAUGHER, Individually  
and d/b/a FAIRHOPE FEED AND SEED  
COMPANY.

Plaintiff

-VS-

ANDREW WAYAND

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW.

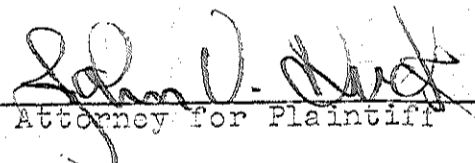
BILL OF COMPLAINT

COUNT ONE:

Plaintiff claims of the Defendant the sum of FOUR HUNDRED FIFTY NINE and 68/100(\$459.68)DOLLARS, due from him by account on to-wit: the 25th day of April, 1958, which sum of money with the interest thereon, is still unpaid.

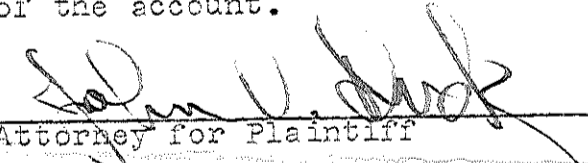
COUNT TWO:

Plaintiff claims of the Defendant the sum of FOUR HUNDRED FIFTY NINE and 68/100(\$459.68)DOLLARS, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant from on to-wit; the 29th day of January, 1957 until on to-wit; the 25th day of April, 1958, which sum of money with the interest thereon, is still unpaid.

  
Attorney for Plaintiff

Note:

Account sued on is hereby evidenced by an itemized and verified statement of the account.

  
Attorney for Plaintiff

Defendant resides at  
Fairhope, Alabam



# FAIRHOPE FEED & SEED COMPANY

PHONE WA 8-8066

FEED - SEED - FERTILIZER

Fairhope, Alabama  
May 5, 1958

In Account With Andrew Wayand

Jan. 29	#4723	3 calf sup	\$15.14	
Feb. 4	#4803	1 " "	4.66	
" 6	4835	Paid		\$1980
" 6	#4835	3 Calf sup	13.98	
" 15	#9106	2 calf sup	9.32	
Oct. 19	#1564	2 dairy conc.	8.92	
" 30	#1683	2 " "	8.90	
Nov. 4	#1749	2 " "	8.90	
" 15	#1892	pnut hay 2 dairy con.	18.20	
" 20	#1946	" " 2 " " 1 oats	17.33	
" 25	#2009	" " 1 meal	15.45	
" 26	#2026	3 dairy conc.	13.20	
" 30	#2073	Paid		15.45
Dec. 5	#2107	pnut hay 3 supp.	24.95	
" 7	#2158	" " 1 bulk beef	16.32	
" 9	#2178	" " 2 dairy conc.	18.20	
" 12	#2214	2 dairy conc.	8.80	
" 13	#2239	Paid		20.00
" 13	"	1 d conc. pnut hay fulk beef	19.50	
" 18	#2307	pnut hay fulk feef d. conc.	13.78	
" 21	#2360	1 n. chow 2 d. conc. 2 pnut hay 2 c. shucks	20.85	
" 24	#2391	Paid		15.00
" "	"	n. chow pnut hay d. conc.	24.96	
" 27	#2420	d. conc. b. beef pnut hay	43.75	
" 30	#2453	2 h. mule pnut hay salt	23.15	
Jan. 3	#2496	pnut hay digest soy b. meal me <sup>d</sup> .	32.34	
" "	#2496	. n. chow 4.75 paid 2.85	4.75	2.85
" 7	#2551	pnut hay 1. S. min.	38.40	
" 7	#2552			75.00
" 11	#2610	pnut hay d. conc. 1 n. chow salt	17.00	
" 16	#2649	d. conc.	8.60	
" 20	2701	pnut hay s. b. meal d. conc.	41.70	
" 22	2723	pnut hay 1 n. chow	18.25	
" 24	2755	1 mash pnut hay meal	31.33	
" 28	2807	s. b. meal pnut hay salt n. chow	38.00	
" 1	2866	d. conc. hay	11.37	
" 3	2893	soy b. meal	13.00	
" 4	2926	n. chow	4.75	
" 7	2988	" "	4.75	
" 11	3047	soy b. meal milk replacer	14.50	
" 15	3109	milk replacer	4.75	
Mar. 28	3827	1 dairy 1 hay	6.03	
Apr. 125	4321	paid		30.00
			637.78	178.10
Net- Total bill			459.68	

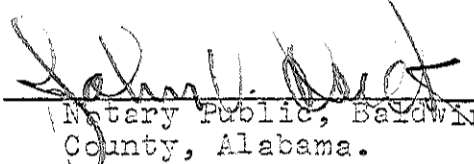
STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in said County, in said State, personally appeared before me, EMMETT BAUGHER, who, being by me first duly sworn says that he is the owner of Fairhope Feed and Seed Company, 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 Andrew Wayard to the Fairhope Feed and Seed Company.

Sworn to and subscribed before me on this the 2<sup>nd</sup> day of

June, 1958.

  
Notary Public, Baldwin  
County, Alabama.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.

Circuit Court, Baldwin County

No. 3565

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Andrew Wayand

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

Andrew Wayand

Defendant.

by Emmett Baugher, Individually and d/b/a Fairhope Feed and Seed Co.

Plaintiff.

Witness my hand this 3rd day of June 19 58

Willie J. Guck, Clerk

Entered June 23, 1958

386 FAIRHOPE AVE.

JOHN V. DUCK  
ATTORNEY AT LAW  
FAIRHOPE, ALA.

Dear Mrs. Alice:

Enclosed you will find Bill of Complaint.  
Will you please be so kind as to attach a summons  
to these as we are out, and PLEASE SEND us a few.

Love John