

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon JOHN NORRIS, JR. 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 W.F. ANDERSON, d/b/a Anderson's Department Store.

Witness my hand this the 19 day of June, 1958.

W. F. Anderson
Clerk

CC

COMPLAINT

W.F. ANDERSON, d/b/a)
Anderson's Department Store)
PLAINTIFF)

VS:)

JOHN NORRIS, JR.)
DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT I:

The plaintiff claims of the defendant ONE HUNDRED THIRTY SEVEN & 06/100 DOLLARS (\$137.06), due from him by account on, to wit: the 25th day of July, 1956, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE HUNDRED THIRTY SEVEN & 06/100 DOLLARS (\$137.06), due from him on account stated between the plaintiff and the defendant on, to wit: the 25th day of July, 1956, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE HUNDRED THIRTY SEVEN & 06/100 DOLLARS (\$137.06), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 25th day of July, 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 18th day of June, 1958.

The defendant's address is:
Foley, Alabama

W. F. Anderson
Attorney for Plaintiff

AFFIDAVIT

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

W.F. ANDERSON, first being duly sworn, deposes and says as follows: My name is W. F. Anderson and I am the owner of Andersons' Department Store in Foley, Alabama and I know to my personal knowledge that John Norris, Jr. of Foley, Alabama owes me a balance for merchandise purchased of \$137.06 since July 25, 1956.

W. F. Anderson

Subscribed and sworn to
and before me this 18th
day of June, 1958.

James C. Cline
Notary Public

72,3587

Received 19 day of June 1958
and on 17 day of Dec -1958
I served a copy of the within B. & C.
on John Norris

By service on

TAYLOR WILKINS, Sheriff

By Charles D. Adams, S.

Foley

Sheriff claims 22 miles at

Two Cents per mile Total \$ 720

TAYLOR WILKINS, Sheriff

BY Charles D. Adams
DEPUTY SHERIFF

SUMMONS

W. F. ANDERSON d/b/a
Anderson's Department Store

VS:

JOHN NORRIS, JR.

FILED

JUN 19 1958

ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA