

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

June 27, 1958

3604

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Fairhope Hdwe & Sup. Co., Inc.
Vs: B. L. Smallwood
Our File: 4406

With this we are handing you Summons and Complaint,
together with itemized and verified statement of
account, ~~along with our check in the sum of \$75.00~~
~~to cover costs.~~ *Resident of State*

Please process, and oblige.

Yours very truly,

E. G. Rickarby

ts
encl.
cc: Fairhope Hdwe & Sup., Co.
7-10-58

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

P. O. BOX 71

November 14, 1958

Mrs. Alice Duck
Clerk of Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

3604

Inre: Fairhope Hardware & Supply
Vs: B. L. Smallwood
Our File: 4406

Request judgment by default in the above mentioned matter for \$210.28, being \$182.07, principal and \$28.21, interest. Judgment on an itemized and verified statement of account; and when Judge Hall enters judgment give me a certificate of judgment together with a bill for costs and oblige.

Yours very truly,



EGR/al

cc: Fairhope Hdwr. & Supply

VERIFICATION FOR STATEMENT OF ACCOUNT

STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, the undersigned Notary Public, personally appeared VERA W. JOYNER, who, being duly sworn, deposes and says that she is Bookkeeper of FAIRHOPE HARDWARE & SUPPLY CO., INC., A Corporation, the owner of the attached account and that the attached account is correct statement of account between FAIRHOPE HARDWARE & SUPPLY CO., INC., a Corporation, and B. L. SMALLWOOD, and there is owing from the said B. L. SMALLWOOD to the said FAIRHOPE HARDWARE & SUPPLY CO., INC., the sum of One Hundred Eighty-two & 07/100 (\$ 182 ⁰⁷/₁₀₀) DOLLARS, with interest from Jan. 1st., 1956.

Vera W. Joyner
AFFIAN

Subscribed and sworn to before me on this the 26 day of June, 1958.

[Signature]
Notary Public, Baldwin County, Alabama.

FAIRHOPE HARDWARE & SUPPLY CO.,
INC., A Corporation,

Plaintiff,

-VS-

B. L. SMALLWOOD,

Defendant.

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

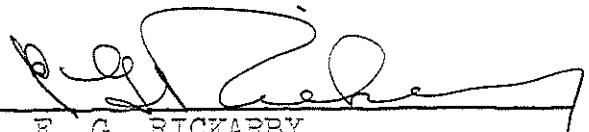
C O M P L A I N T

Count I.

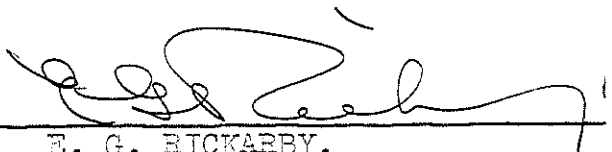
The Plaintiff claims of the Defendant ONE HUNDRED AND EIGHTY-TWO DOLLARS AND SEVEN CENTS (\$182.07) due from him by account on, to-wit, the 24th day of March, 1956, which sum of money with interest thereon is still unpaid.

Count II.

The Plaintiff claims of the Defendant ONE HUNDRED AND EIGHTY-TWO DOLLARS AND SEVEN CENTS (\$182.07) due from him for merchandise, goods and chattel, sold by the Plaintiff to the Defendant from the 11th of January, 1956 to March 24th, 1956; which sum of money with the interest thereon is still unpaid.


E. G. RICKARBY,
Attorney for Plaintiff.

Note: The account sued on is evidenced by an itemized and verified statement filed herewith.


E. G. RICKARBY,
Attorney for Plaintiff.

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 B. L. SMALLWOOD

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 B. L.

SMALLWOOD

_____, Defendant.

by FAIRHOPE HARDWARE & SUPPLY CO., INC., a Corporation,

_____, Plaintiff.

Witness my hand this 30 day of June 1958

Emmett 10-14-58 Desig. Duck, Clerk