

SUMMONS

3653

STATE OF ALABAMA  
COUNTY OF BALDWIN

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA -----GREETING:

You are hereby commanded to summons Thomas A. Smith to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of Edward M. Chadbourne, Jr..

Witness my hand this 13 day of Sept, 1958.

Reese J. French  
Clerk

COMPLAINT

EDWARD M. CHADBOURNE, JR.,  
d/b/a CHADBOURNE CONSTRUCTION COMPANY

Plaintiff

vs.

THOMAS A. SMITH

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

I.

The plaintiff claims of the defendant Three Hundred Sixty Eight and 75/100ths (\$368.75) Dollars, due from him on account to-wit: the 6th of September, 1957, which sum of money, with interest thereon, is still unpaid.

II.

The plaintiff claims of the defendant Three Hundred Sixty Eight and 75/100ths (\$368.75) Dollars, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: the 6th of September, 1957, which sum of money, with interest thereon, is still unpaid.

  
Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof, an itemized statement of account verified by affidavit of Edward M. Chadbourne, a competent witness, sworn to before a Notary Public, which statement shows that amount due on this account as of the 28th of August, 1958, and due at present.

The defendant resides at Lillian, Alabama.

STATE OF FLORIDA

COUNTY OF ESCAMBIA

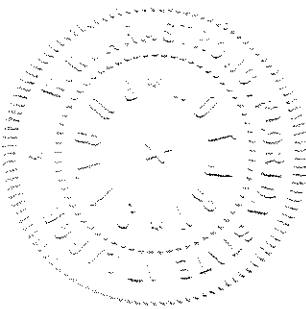
AFFIDAVIT

Personally appeared before me this day, Edward M. Chadbourne, Jr., surviving partner of Edward M. Chadbourne and Edward M. Chadbourne, Jr., doing business as Edward M. Chadbourne Paving Contractor, who being by me first duly cautioned and sworn, deposes and says:

That the attached itemized account, rendered to Mr. Thomas A. Smith of Lillian, Alabama, is a correct and just account of monies due for services rendered on the request of the said Thomas A. Smith.

Edward M. Chadbourne, Jr.  
EDWARD M. CHADBOURNE, JR.

Subscribed and sworn before me this 28 day of ~~September~~<sup>August</sup>, 1958, in Pensacola, Escambia County, Florida.



W. W. Armstrong  
Notary Public

My commission expires:

My Commission Expires Jan. 24, 1961