

COMPLAINT

DOLCITO QUARRY COMPANY,
a corporation

Plaintiff

VS.

A. R. BAIN

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

3659

I.

The Plaintiff claims of the Defendant One Hundred Ninety Five and 21/100ths (\$195.21) Dollars, due from him on account, to-wit: the 29th day of July, 1957, which sum of money, with interest thereon, is still unpaid.

II.

The Plaintiff claims of the Defendant One Hundred Ninety Five and 21/100ths (\$195.21) Dollars, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: the 29th day of July, 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 Edna Beardon, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 18th day of September, 1958, and due at present.

The Defendant resides at the Pure Oil Service Station, Five Miles South of Foley.

STATE OF ALABAMA)
JEFFERSON COUNTY)

AFFIDAVIT

EDNA BEARDEN being duly sworn hereby deposeth and saith
as follows:

I, Edna Bearden, bookkeeper for Dolcito Quarry Company,
have personal knowledge of the account owing Dolcito Quarry Company,
a corporation, by Mr. A. R. Bain of Foley, Alabama, and the sum
owing in the amount of \$195.21 as set forth in the foregoing complaint
is true and correct as of today's date. It represents two carloads
of agricultural limestone shipped on the order of Mr. A. R. Bain on
July 8, 1957 in the amount of \$148.86, and one carload of agricultural
limestone shipped on the order of Mr. A. R. Bain on July 29, 1957,
in the amount of \$46.35.

Edna Bearden
Edna Bearden

Sworn to and subscribed before
me on this 18th day of September,
1958.

Mary Jo McNeal
Notary Public

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No.

.....TERM, 1958

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon A. R. BAIN

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 _____

A. R. BAIN

Defendant

by DOLCITO QUARRY COMPANY, a corporation

Plaintiff.....

Witness my hand this 20 day of Sept 1958

Deicy Henck Clerk