

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

3751

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon PERCY B. BREWER, 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 L. E. SHEPHERD.

Witness my hand this the 23 day of January, 1959.

Richard L. Duck
CLERK

@@

COMPLAINT

L. E. SHEPHERD)	
PLAINTIFF)	IN THE CIRCUIT COURT OF
)	
VS:)	BALDWIN COUNTY, ALABAMA
)	
PERCY B. BREWER)	AT LAW
DEFENDANT)	

COUNT I:

The plaintiff claims of the defendant ONE HUNDRED THIRTY SIX & 95/100 DOLLARS (\$136.95), due from him by account on, to wit: the 15th day of January, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE HUNDRED THIRTY SIX & 95/100 DOLLARS (\$136.95), due from him on account stated between the plaintiff and the defendant, on to wit: the 15th day of January, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE HUNDRED THIRTY SIX & 95/100 DOLLARS (\$136.95), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 15th day of January, 1958, 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 21st day of January, 1959.

Executed Jan. 24, 1959

James O. Clark
Attorney for Plaintiff

W. 3751

SUMMONS AND COMPLAINT

Received 23 day of Jan 1959

and on 24 day of Jan 1959

I served a copy of the within A & C

on L. E. Shepherd

By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Zolbert D. S.

o mi

L. E. SHEPHERD

VS:

PERCY B. BREWER

FILED

JAN 23 1959

ALICE J. DUCK, clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

Statement

Foley, Ala., 1-15 1959

Mr. P. B. Brewer

Shepherd Printing & Stationery Co.

P. O. BOX 18

FOLEY, ALA.

PHONE WH 3-6401

Balance due on Account \$136.95
Balance due on Smith-Corona
Percussion typewriter

State of Alabama
Baldwin County

I, L. E. Shepherd, ~~now~~
first being duly sworn
deposes & says that he is
owner of Shepherd Printing
Stationery Co of Foley, Alabama
& said Percy B Brewer a
typewriter & the balance due is
\$136.95, after allowing all past
Credits - 213 L. E. Shepherd

~~Sworn to~~

Sworn to & subscribed
before me this 21st day
of January, 1959

Wm. Allen / W.
Notary Public
Baldern Creek, Cal.