(3769)

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

#### TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HUMAN ENGINEERING, INC., an Alabama Corporation, to appear and answer, plead or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, at Law, for said County and State, against it by JAMES W. WELGOS.

Herein fail not. Due return make of this writ as the law directs. Witness this the \_\_\_\_\_ day of February, 1959.

CLERK OF COURT

Service may be made on H. G. E. Rhodes at Human Engineering, Inc. one mile East of Highway 98 on Marlow Road.

JAMES W. WELGOS,

Plaintiff

BALDWIN COUNTY, ALABAMA

Versus

AT LAW

HUMAN ENGINEERING, INC.,
an Alabama Corporation,

Defendant

## COUNT ONE:

The Plaintiff claims of the Defendant the sum of \$82,990.00 due from it by account on the first day of February, 1959, which sum of money, with the interest thereon, is due and unpaid.

### COUNT TWO:

The Plaintiff claims of the Defendant the sum of \$82,990.00 for work and labor done for the Defendant by the Plaintiff from the 15th day of August, 1951 to February 1, 1959, at its request, and for merchandise, goods and chattel sold by the Plaintiff to the Defendant during said period, and for money paid by the Plaintiff for the

Defendant during said period, at its request, which sum of money, with the interest thereon, is still unpaid.

ATTORNEY FOR PLAINTIFF

Verified statement of account attached to original Bill of Complaint.

JAMES W. WELGOS,
Complainant

vs.

HUMAN ENGINEERING, INC., AN ALABAMA CORPORATION,

Defendant

## SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED FED 16 '59 MG I RES CLEME

# Human Engineering, Inc.

FOR PRECISE PURPOSE -

METHOD ALIGNMENT

252 MERSHON ST., FAIRHOPE, ALABAMA PHONE WAVERLY 8-8676 - CABLE ADDRESS: FAIRINTERX
REV. JAMES W. WELGOS, DIRECTOR

	Statement of backsalary and investment of James $^{W}.$ Well Engineering, Inc	gos in Human	
*	August 15th, 1951 to Jan. 1st 1955 Salary \$10,000.00 per year		
	Jan. 1st, 1955 to Jan. 31st, 1959 Salary \$8,000.00 per year	\$32,750.00 \$25,750.00	The second secon
	Total back salary due	\$51,250.00	
	5% royalty due on sale of publications (From Jan. 1st, 1955 to Jan. 31st, 1959) Publications - 5% royalty -	\$100,000.00 5,000.00	d u <b>e</b>
	Dowhpayment on 1957 Ford Station wagon	2,600.00	
	Investment in equipment to start Eidetic Foundation Press Mimeograph machine	700.00 - 250.00	
	Vari-typer	485.00 200.00	
	Total	- 3,110.00	
	Cost of converting 2 car gararge to office	1,250.00	
<i>3</i> e	Art supphies (1951-1955)	475.00	
	Personal investment (cash out of pocket)  1951  1952  1953  1954  1955  1956  1958  Present petty cash slips outstanding	700.00 1,255.00 1,100.00 2,300.00 2,200.00 1,800.00 4,250.00 3,500.00 2,200.00	_
	Total due to James W. Welgos as of Jan. 31st, 1959	\$82,990.00	a salah da karang da Karang da karang da k

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared James. W. Welgos, who, being by me first duly sworn, deposes and says that the foregoing is a true and accurate statement of account and that there are no off-sets or counter-claims against the same.

JAMES W. WELGOS

Sworn and subscribed to before me this the /2 day of February, 1959.

NOTARY PUBLIC

Dear Mrs. Duck,

Please have service made on the enclosed Bill of Complaint. Thanking you in advance, I am

