

Defendant

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

BILL OF COMPLAINT

COUNT ONE:

The Plaintiff claims of the Defendant the sum of TWO HUNDRED SIXTY SEVEN and 94/100 (\$267.94) DOLLARS, due from him by account on the 24th day of January, 1959, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO:

Plaintiff claims of the Defendant the sum of TWO HUNDRED SIXTY SEVEN and 94/100 (\$267.94) Dollars, for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit: the 24th day of January, 1959, which sum of money, with the interest thereon, is still unpaid.

COUNT THREE:

Plaintiff claims of the Defendant the sum of TWO HUNDRED SIXTY SEVEN and 94/100 (\$267.94) Dollars, on account stated between the Plaintiff and the Defendant on the 24th day of January, 1959, which sum of money, with the interest thereon, is still unpaid.

~~Attorney for Plaintiff~~

SUMMONS AND COMPLAINT

Moore Prg. 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 EARL J. TEFTT

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 _____

EARL J. TEFTT _____, Defendant

by MRS. GERTRUDE GILMORE, Ind. and d/b/a FAIRWOOD GROCERY _____, Plaintiff

Witness my hand this 29 day of April 19 59

Ex. 5-23-59 Deice F. Duck _____, Clerk

No. 3827 Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

MRS. GERTRUDE GILMORE, Ind.

and d/b/a FAIRWOOD GROCERY

Plaintiffs

vs.

Earl J. Leftt.

Defendants

Summons and Complaint

Filed _____ 19____

FILED

APR 29 1959

ALICE J. DUCK, CLERK
REGISTER

Clerk

Plaintiff's Attorney

Defendant's Attorney

Wright Car Voluntary

Defendant lives at
CORNER of Magnolia Ave. & Summit
St. Fairhope, Ala. works at.
~~New Spic Rest. Mobile, Ala.~~

Received In Office

4/29 1959

_____, Sheriff

I have executed this summons

this 5-23 1959

by leaving a copy with

Earl J. Leftt.

Sheriff claims 20 miles at 200

Ten Cents per mile Total \$2.00

TAYLOR WILKINS, Sheriff

BY Eddie Stedman
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Eddie Stedman Deputy Sheriff