

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon JACK SEYMOUR d/b/a JACK'S MONUMENT CO. 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 MODERN GRANITE CO., a partnership, Elberton, Georgia.

Witness my hand this the 21st day of June, 1959.

Exp. 6-16-59

Reice J. ...
Clerk

CC

COMPLAINT

3868

MODERN GRANITE CO.,
a partnership
PLAINTIFF

VS:

JACK SEYMOUR, d/b/a
JACK'S MONUMENT CO.,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant ONE THOUSAND SIXTY-FIVE & 30/100 DOLLARS (\$1,065.30), due from him by account on, to wit: the 1st day of January, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE THOUSAND SIXTY-FIVE & 30/100 DOLLARS (\$1,065.30), due from him on account stated between the plaintiff and the defendant on, to wit: the 1st day of January, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE THOUSAND SIXTY-FIVE & 30/100 DOLLARS (\$1,065.30), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 1st day of January, 1959, 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 1st day of January, 1959.

The defendant's address is:
Bay Minette, Alabama

W. H. ...
Attorney for Plaintiff,

GENERAL OFFICES
UNITED MERCANTILE AGENCIES

ADJUSTMENTS and COLLECTIONS
LOUISVILLE, KY.

County of Elbert
Georgia } SS
State of _____

Before me, Shirley Shell a Notary Public duly commissioned
and sworn in and for the above state and county, this day personally appeared John K. Coggins
to me well known, who being by me first duly sworn says that;

- *1. He is an individual trading as _____
*2. That he and B. F. Coggins, Jr. & Ann Coggins DeBarde are partners trading as Modern Granite Co.
*3. That he is treasurer of _____ of _____
a corporation incorporated under the laws of the State of Georgia and that the foregoing account
in favor of Modern Granite Company and against Jacks Monument Company
showing a balance and amount due of 1065.30 with 6% interest from the
1st day of January 1959, until paid, is within his knowledge just true and correct; that
it is justly and truly due and unpaid; that all just and lawful offsets, credits, discounts and payments have been
allowed and the said amount is due after said allowance and exclusive of all set-offs and just grounds of defense;
that the goods in said accounts were sold and delivered as therein charged and on said last named day said
amount became due and payment thereof was demanded and no part of same has been paid.

Sworn to and subscribed before me this 29th day of February 1959

*Use paragraph covering.

39

Notary Public, Georgia
My commission expires Apr. 5, 1963

70-38686

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Received 15 day of June 1959
and on 16 day of June 1959
I served a copy of the within on Jack Seymour
on Jack Seymour
By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbert D. S.
omi

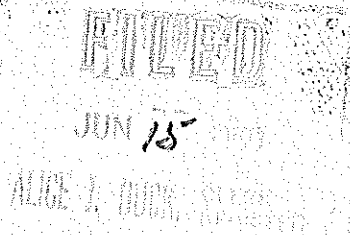
MODERN GRANITE CO., a partners
ship,

PLAINTIFF

VS:

JACK SEYMOUR, d/b/a/JACK'S
MONUMENT CO.,

DEFENDANT



LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

MODERN GRANITE COMPANY

Wholesale Manufacturers of Quality Memorials

P. O. Drawer 392

ELBERTON, GEORGIA

May 25, 1959

JACKS MONUMENT COMPANY
BAY MINETTE,
ALABAMA

Inv. # 6826 - 9/1 dating	797.50	
Inv. # 6934	49.10	
Inv. # 6935	152.95	
Inv. # 6936	19.20	
Inv. # 6937	22.10	
Inv. # 6938	16.45	
Inv. # 6939	32.00	
Inv. # 6940	138.00	
Inv. # 6941	38.00	
Check returned	291.80	
Check returned 2nd time	291.80	
Check returned	1265.30	
Check		291.80
Check redeposited		291.80
Check		1265.30
Check (U. M. A.)		100.00
Check "		100.00
38	BALANCE -	1065.30

MODERN GRANITE COMPANY

Wholesale Manufacturers of Quality Memorials

P. O. Drawer 392

ELBERTON, GEORGIA

Page 2

Jacks Monument Co.

State of Georgia
Elbert County;

Personally appeared before me, an officer
authorized by law to administer oaths, John
K. Coggins, President of Modern Granite Co.,
who says that the foregoing account is cor-
rect, just, due, and unpaid, this 25th day of
May, 1959.

Merle Shell N.P.

Notary Public, Georgia State at Large
My Commission Expires Apr. 5, 1963

MODERN GRANITE COMPANY

Wholesale Manufacturers of Quality Memorials

P. O. Drawer 392

ELBERTON, GEORGIA

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W. H. H. H. H. H. N.P.

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My Commission Expires Apr. 5, 1963