

STATE OF ALABAMA )  
BALDWIN COUNTY ) . . . IN THE CIRCUIT COURT . . LAW SIDE . .

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon Herbert Lunsford to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of Battie Mixon and Boone Stuckey, co-partners.

WITNESS my hand this the 16 day of June, 1959.

Alvin J. Duck  
Clerk

Ex 7-14-59  
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- COMPLAINT -

3869

BATTIE MIXON and BOONE  
STUCKEY, co-partners,

Plaintiffs,

-vs-

HERBERT LUNSFORD,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COUNT I

The Plaintiffs claim of the Defendant Five Hundred Fourteen and 07/100 Dollars (\$514.07) due from him by account on the 1st day of July, 1956, which sum of money, with the interest thereon, is still unpaid.

COUNT II

The Plaintiffs claim of the Defendant Five Hundred Fourteen and 07/100 Dollars (\$514.07) for merchandise, goods and chattels sold by the Plaintiffs to the Defendant on the 22nd, 23rd and 25th days of June, respectively, in the year 1956, which sum of money, with the interest thereon, is still unpaid.

W. H. Chapman  
Attorney for the Plaintiffs

70.3869

SUMMONS AND COMPLAINT

Received 16 day of June 1959  
d on 17 day of July 1959  
served a copy of the within Herbert Lunsford

service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Charles Lunsford S.

J. Lunsford

Sheriff claims 22 miles at  
Ten Cents per mile Total \$ 2.20  
TAYLOR WILKINS, Sheriff  
BY CC  
DEPUTY SHERIFF

BATTIE MIXON and BOONE STUCKEY,  
co-partners,

Plaintiffs,

-VS-

HERBERT LUNSFORD,

Defendant.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

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FILED

JUN 15 1959

ALICE L. DUCK, CLERK  
REGISTER

CECIL G. CHASON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

BATTIE MIXON AND BOONE  
STUCKEY, co-partners,

Plaintiffs,

VS.

HERBERT LUNSFORD,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

ANSWER

I.

The defendant, for answer to the complaint, saith that there is no amount due the plaintiffs from the defendant on account.

II.

The defendant for further answer to the complaint, saith that all merchandise, goods, and chattels sold the defendant by the plaintiffs on the 22nd, 23rd and 24th days of June, respectively, in the year 1956, have been paid for by defendant by Check No. 795 and 807 drawn on the Farmer's and Merchants Bank of Foley, Alabama; Defendant for further answer saith that the amount claimed of the defendant represents the difference in price of watermelons of a reasonable quality and watermelons of an inferior quality sold to the defendant by the Plaintiffs on the aforesaid date.

III.

The defendant, for answer to the complaint, saith he is not guilty of the matters alleged therein.

  
James A. Brice

  
Richard G. Lacey

Defendant demands trial by Jury.

  
OF Counsel

