

SUMMONS

STATE OF ALABAMA
COUNTY OF BALDWIN

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

TO ANY SHERIFF OF THE STATE OF ALABAMA-----GREETINGS:

You are hereby commanded to summons Hubert Mobley to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of Peoples Fertilizer Company, a corporation.

WITNESS my hand this 20 day of Aug., 1959.

Walter J. Luck
CLERK

Exp: 9-10-59

COMPLAINT

PEOPLES FERTILIZER COMPANY,)
a corporation,)

Plaintiff,)

VS.)

HUBERT MOBLEY,)

Defendant.)

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

3946

I.

The Plaintiff claims of the Defendant Five Hundred Ten and 53/100 Dollars (\$510.53), due from him on account, to-wit: the 16th day of June, 1955, which sum of money, with interest thereon, is still unpaid.

II.

The Plaintiff claims of the Defendant Five Hundred Ten and 53/100 Dollars (\$510.53), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: the 16th day of June, 1955, which sum of money, with interest thereon, is still unpaid.

Richard C. Lacey
Richard C. Lacey

James A. Price
James A. Price

There is attached hereto as Exhibit A and made a part thereof an itemized statement of account verified by affidavit of Charles Smith, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 16th day of June, 1955.

Defendant resides at Foley, Alabama.

FILED
AUG 20 1959

ALICE J. DUCK, Clerk

AFFIDAVIT

STATE OF ALABAMA)

COUNTY OF BALDWIN)

Before me, Richard C. Lacey, a Notary Public in and for said County in said State, personally appeared Chan Smith, who, being by me first duly sworn, deposes and says:

That he is the General Manager of Peoples Fertilizer Company; that the annexed statement of the account of said Peoples Fertilizer Company against Hubert Mobley, is just, true and correct; that there is now due on said account Five Hundred Ten and 53/100 Dollars (\$510.53), after deducting all credits, set-offs, and counter-claims.

Chan Smith
Chan Smith

Sworn to and subscribed before me on
this the 15 day of August, 1959.

Witness my hand and official seal.

Richard C. Lacey
Notary Public, Baldwin County, Alabama

195

Foley, Alabama

PEOPLES FERTILIZER CO.

HIGH GRADE FERTILIZER

PHONE WH 3-4201

1955

	Statement rendered		506.21
6-16	4230 .05 tons Ammo. Nit. @ 36.32		4.32
			\$ 510.53
	The above invoice billed at time price		

April 26, 1955

195

Mr. Hubert Mobley

Foley, Alabama

IN ACCOUNT WITH

PEOPLES FERTILIZER CO.
HIGH GRADE FERTILIZER

FOLEY, ALA.

PHONE WH 3-4201

1955

	Statement rendered		Net		197.70
2-22	2019 1.00 tons Limestone				
2-22	2026 1.00 tons Limestone				
2-23	2045 1.00 tons Limestone				
2-24	2063 .60 tons 6-2-3 PB				
2-25	2102 1.00 tons 6-3-3 PB				
3-17	2818 1.00 tons 4-12-12 BB				
3-18	2830 1.00 tons 4-12-12 BB				
4-2	3062 1.00 tons 4-10-7 PB				
	7.60 tons				
	1.00 tons 4-10-7 PB @ 37.26		37.26		
	2.00 tons 4-12-12 BB @ 44.21		88.42		
	1.60 tons 6-3-3 PB @ 41.43		66.37		
	3.00 tons Limestone @ 9.47		28.41		
	7.60 tons		220.46		
	Less hauling 4.60 tons @ 1.50		6.90		213.56
					411.26
4-22	3607 1.10 tons Ammo. Nit. @ 86.32				94.95
					\$ 506.21
The above invoices are billed at time prices					
141					

195

Foley, Alabama

IN ACCOUNT WITH

HIGH GRADE FERTILIZER

PHONE WH 3-4201

1055

[illegible]

Received "20" day of Sept 1959
d on 10 day of Sept 1959
erved a copy of the within Hubert Mobley
service on _____

TAYLOR WILKINS, Sheriff
By Charlie Bonser

Bonservance

Sheriff claims 86 miles at
Ten Cents per mile Total \$ 8.60
TAYLOR WILKINS, Sheriff
BY [Signature]
DEPUTY SHERIFF

3946

Peoples Fertilizer
Co. a corp.

v.s.

Hubert Mobley

FILED

AUG 20 1959

ALICE J. DUCK, Clerk

LAW OFFICES OF
JAMES A. BRICE
RICHARD C. LACEY
FOLEY, ALABAMA