

JAMES A. BRICE  
ATTORNEY AT LAW  
FOLEY, ALABAMA

POST OFFICE BOX 298

November 5, 1959

WHITEHALL 3-3601

Mrs. Alice J. Duck  
Circuit Clerk  
Bay Minette, Alabama

3961

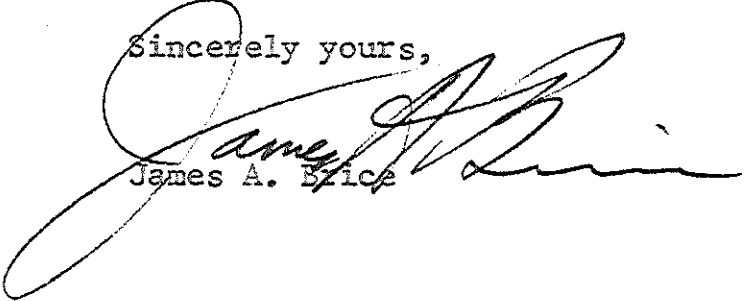
Re: J. A. Pilgrim  
vs: F. A. Lipscomb  
At Law

Dear Mrs. Duck:

Please dismiss this action for the Plaintiff and  
send us a cost bill.

Thank you.

Sincerely yours,

  
James A. Brice

JAB/vd

S U M M O N S

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 F. A. Lipscomb to appear before the Circuit Court of Baldwin County, Alabama, 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 J. A. Pilgrim.

Witness my hand this the 31 day of Aug, 1959.

George H. Wick  
Circuit Clerk

Exp. 9-11-59 . . . . .

C O M P L A I N T

J. A. PILGRIM, ) IN THE CIRCUIT COURT OF  
Plaintiff, )  
VS. ) BALDWIN COUNTY, ALABAMA  
F. A. LIPSCOMB, ) AT LAW.  
Defendant. )

I.

The Plaintiff claims of the Defendant Three Hundred Five and 20/100 (\$305.20) Dollars, due from him on account, to-wit: the 17th day of December, 1958, which sum of money, with interest thereon, is still unpaid.

II.

The Plaintiff claims of the Defendant Three Hundred Five and 20/100 (\$305.20) Dollars, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: the 17th day of December, 1958, which sum of money, with interest thereon is still unpaid.

ATTORNEYS FOR PLAINTIFF

James A. Brice  
JAMES A. BRICE  
Richard C. Lacey  
RICHARD C. LACEY

There is attached hereto as Exhibit "A" and made a part thereof an itemized statement of account verified by affidavit of J. A. Pilgrim, a competent witness, sworn to before a Notary Public which statement shows the amount due on this account as of the 17th day of December, 1958, and due at the present.

The Defendant resides at Magnolia Springs, Alabama.

STATEMENT OF ACCOUNT

OF

J. A. PILGRIM

436 bushels of oats @\$ .70 per bushel sold to F. A. Lipscomb  
on the 17th day of December, 1958.

TOTAL:

\$305.20

  
J. A. PILGRIM

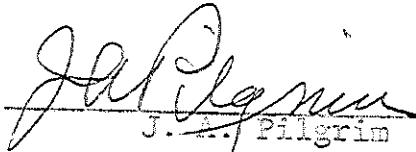
A F F I D A V I T

STATE OF ALABAMA )

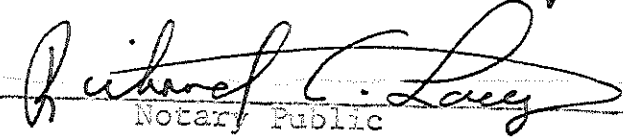
COUNTY OF BALDWIN )

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

That the annexed statement of account of said J. A. Pilgrim against F. A. Lipscomb is just, true and correct; that there is now due on said account Three Hundred Five and 20/100 (\$305.20) Dollars, after deducting all credits, set-offs and counterclaims.

  
J. A. Pilgrim

Sworn to and subscribed before me this the 29 day of August, 1959. Witness my hand and official seal.

  
Notary Public

Received 3/ day of Aug 1959  
d on 11 day of Sept 1959  
served a copy of the within 290  
J.A. Lipscomb  
y service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By Foley

Sheriff claims 72 miles at  
Ten Cents per mile Total \$ 7.20  
TAYLOR WILKINS, Sheriff  
BY CC  
DEPUTY SHERIFF

No. 3961

J. A. Pilgrim

vs

F. A. Lipscomb

FILED

AUG 31 1959

ALICE J. DUCK, CLERK  
REGISTER

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