

SUMMONS

STATE OF ALABAMA)

BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon J.S. SEYMOUR, alias Jack Seymor, 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 Bay Minette, against the said J.S. Seymore, alias Jack Seymor, Defendant, by FRED MITCHELL, doing business as Mitchell's Gulf Service Station, Plaintiff.

Ans 22 Oct 1959

[Signature]
Clerk

^{H.}
FRED MITCHELL, JR. d/b/a)

MITCHELL'S GULF SERVICE)

STATION,)

Plaintiff,)

Vs.)

J. S. SEYMOUR, alias)

Jack Seymor,)

Defendant.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

41019

COUNT 1.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED (\$100.00) DOLLARS due from the Defendant by a check drawn by him on THE FIRST NATIONAL BANK OF BAY MINETTE, of Bay Minette, Alabama, in favor of the Plaintiff, for said amount, on the 1st day of April, 1958, which said check was duly presented and payment refused, there being stamped on its face at said bank "Insufficient Funds", which sum of money, with interest thereon, is due and unpaid.

COUNT 2.

The Plaintiff claims of the Defendant SIXTY (\$60.00) DOLLARS, due from him by account on the 26th day of July, 1957, which sum of money, with interest, is still unpaid, and is the property of the Plaintiff.

COUNT 3.

The Plaintiff claims of the defendant SIXTY (\$60.00) DOLLARS, due from him on account stated between the Defendant and the Plaintiff on the 26th day of July, 1957, which sum of money, with interest, is still unpaid, and is the property of the Plaintiff.

COUNT 4.

The Plaintiff claims of the Defendant SIXTY (\$60.00) DOLLARS, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 26th day of July, 1957, 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 whole amount due for which this suit is made, to-wit, the One Hundred Dollars (\$100.00) sued for in Count 1 of this Bill of Complaint, and the SIXTY (\$60.00) sued for in Counts 2, 3 and 4 of this Bill of Complaint, which said Affidavit shows the amount due on the 19th day of October, 1959.

Kenneth Cooper
Attorney for Plaintiff

DEFENDANT'S ADDRESS:

~~Bay Minette, Alabama~~
JOHN'S RIDEOUT
BIRMINGHAM, ALA.
Works for
L. JOHNS

Defendant.

IN LAW.

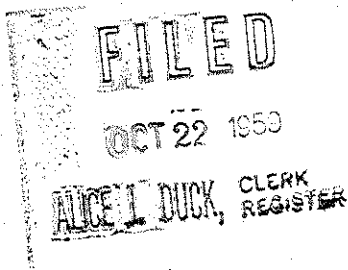
STATE OF ALABAMA)
BALDWIN COUNTY)

Before me, the undersigned Notary Public, personally appeared Fred ^{H.}Mitchell, d/b/a Mitchell's Gulf Service Station, at Stapleton, Alabama, who, being duly sworn, deposes and says that he is the owner and operator of Mitchell's Gulf Service Station, and owner of the attached account between Fred Mitchell, d/b/a Mitchell's Gulf Service Station, and Jack Seymour, and that there is owing from the said Jack Seymour the sum of ONE HUNDRED SIXTY (\$160.00) DOLLARS, with interest from April 1st, 1958.

Frederic H. Mitchell Jr.

Subscribed and sworn to before me this 19 th day of
October, 1959.

Kenneth Cooper
Notary Public, State at Large
State of Alabama



250
CASE NO. 4019

FRED H. MITCHELL, JR., d/b/a
MITCHELL'S GULF SERVICE
STATION,

Plaintiff,

Vs.

J.S. SEYMOUR, alias JACK
SEYMOR,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

BILL OF COMPLAINT

John's 8th Ave

FILED

OCT 22 1959

ALICE J. DUCK, CLERK
REGISTER

Walter M. John Adams
adams

EXECUTED this the 18
day of Nov. 1959
by leaving a copy of the within with
J. S. Seymour @

HOLT A. McDOWELL, Sheriff
Jefferson County, Alabama

By *W. J. Hogan* D.S.



FIRST NATIONAL BANK
OF BAY MINETTE

BAY MINETTE, ALA. 4-1 1958

Pay to THE ORDER OF F. H. Mitchell Jr. \$ 100.00

One Hundred Dollars DOLLARS

FOR Telex
payment

RETURNED ACCOUNT OF INSUFFICIENT FUNDS
\$1.00 CHARGE
DRAWER OF
J. J. Ingram



Gulf Service Station
GASOLINE, OILS, GREASING
TIRES & ACCESSORIES

Ph. 6150

Stapleton, Ala.,

7-26 1957

Sold to

Jack Segmon

Address

M5907

GAS

OIL

ANTI-FREEZE

CHG.

4 tires @ 40.00 \$160.00

46

SS

Rec'd By

Your at

once.