

STATE OF ALABAMA  
BALDWIN COUNTY

To any sheriff of the State of Alabama

You are hereby commanded to summon Paul C. Anderson, individually and doing business as Silverhill Motor Company, to appear within thirty days from the service of this writ in the circuit court, to be held for said county at the place of holding the same, then and there to answer the complaint of The Kemper Thomas Company, a corporation.

Witness my hand, this 30 day of April 1931.

J. W. Rice  
Clerk of the Circuit Court.

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THE KEMPER-THOMAS COMPANY,  
a corporation,

Plaintiff,

-Vs-

PAUL C. ANDERSON, individually  
and doing business as Silverhill  
Motor Company,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

COUNT ONE

Plaintiff claims of the defendant the sum of \$90.23, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant, to-wit, August 6, 1928, which sum of money, together with interest thereon, is still unpaid.

COUNT TWO

Plaintiff claims of the defendant the sum of \$90.23, due from him by account stated between plaintiff and defendant on, to-wit, August 6, 1928, which sum of money, together with interest thereon, is still due and unpaid.

COUNT THREE

Plaintiff claims of the defendant the sum of \$90.23, due from him by account on, to-wit, August 6, 1928, which sum of money, together with interest thereon, is still unpaid.

The account sued on is evidenced by itemized, verified statement filed with this complaint.

Gray + Poir  
Attorneys for Plaintiff

We acknowledge ourselves as surety for the payment of the court cost in this case.

Gray + Poir  
Attorneys for Plaintiff.

THE STATE OF OHIO }  
HAMILTON COUNTY } S.S.

BEFORE ME, Personally appeared A. F. Willenbrink, who being duly sworn, says that he is the duly authorized agent of THE KEMPER-THOMAS COMPANY, a corporation incorporated under the laws of the state of Ohio, the owner of the claim against Silver Hill Motor Co. hereto attached. That said claim and every item thereof, is, within the knowledge of affiant, just and lawful; that the consideration therefore is GOODS SOLD AND DELIVERED AND MORE FULLY SET FORTH IN THE ITEMIZED ACCOUNT HERETO ATTACHED; that there is now due and unpaid on said claim the sum of \$90.23 Dollars as principal, and that interest on said principal is claimed from Jan. 1st, 1929 until paid, all at six (6) per cent per annum; that there are no offsets nor counter claims whatever against the same; that no payments have been made on said claim by way of discounts or otherwise; that no usury is embraced therein, and that said owner has no security whatever for the same to the best of affiant's knowledge and belief.

SWORN TO BEFORE ME and signed in my presence, this Eighteenth

day of April 1931 A. D.

[Signature]  
Notary Public, Hamilton Co., State of Ohio

D. J. PARRY  
MY COMMISSION EXPIRES JULY 26, 1933

Cincinnati, O., April 18th, 19

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Silver Hill Motor Company

Silver Hill, Ala.

FILE No. 93500

IN ACCOUNT WITH

## THE KEMPER-THOMAS COMPANY

"STATION H"

1928

Aug.

6 100 Calendars

48. 00

98 over

. 96

1 over

32. 50

1. 30Storage & freight on  
Returned shipment

82. 76

7. 47

90. 23

Accepted this  
The 4<sup>th</sup> day of May  
1931 by burning copy  
of within persons &  
complaint on  
Paul C. Anderson

W. H. Stuart  
G. A. P. Sheriff  
D. S.

Original

RECORDED

The-Knap-Thomas  
to 25

Paul C. Anderson  
Silver Hill

Filed Apr 30/31  
D. R. R. R.  
A. S. K.