

PEOPLES FERTILIZER COMPANY,  
a corporation,

Plaintiff,

vs.

W. J. HALL,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

Comes the defendant and for answer to the plaintiff's complaint and to each count thereof, separately and severally, says under oath:

1. That the facts therein alleged are untrue.
2. That he is not indebted to the plaintiff in any amount.
3. That he denies each and every item of the statement of account, with the exception of the item of June 1st, 1929, which item was bought by him and paid for in cash.

W. J. Hall

Sworn to and subscribed before  
me, on this the 31st day of  
August, 1931.

Wm. Hall

Notary Public, Baldwin  
County, Alabama.

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 W. J. Hall 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 same, then and there to answer the Complaint of the Peoples Fertilizer Company, a Corporation.

Witness my hand this 28<sup>th</sup> day of July, 1931.

*J. W. Robinson*  
Clerk.

COMPLAINT.

PEOPLES FERTILIZER COMPANY,  
A Corporation,

Plaintiff,

-vs-

W. J. HALL,

Defendant.

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

COUNT 1: Plaintiff claims of the Defendant One Hundred Two & 40/100 Dollars (\$102.40) due from him by account on, to-wit, June 1st, 1929.

COUNT 2: Plaintiff claims of the Defendant One Hundred Two & 40/100 Dollars due from him on account stated between the Plaintiff and Defendant on, to-wit, June 1st, 1929.

COUNT 3: Plaintiff claims of the Defendant One Hundred Two & 40/100 Dollars (\$102.40) due from him for merchandise, goods and chattles sold by the Plaintiff to the Defendant on, to-wit, between September 12th, 1927 and June 1st, 1929.

COUNT 4: The Plaintiff claims of the Defendant One Hundred Two & 40/100 Dollars (\$102.40) due from him for work and labor done for the Defendant by the Plaintiff on, to-wit, September 12th, 1927 and June 1st, 1929 at his request.

Which sums of money, together with interest thereon, are still due and unpaid.

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Hyatt, Head & Hasan  
Attorneys for Plaintiff.

An itemized, verified statement  
of the account here sued on is  
attached hereto and made a part  
hereof.

Hyatt, Head & Hasan  
Attorneys for Plaintiff.

LAW OFFICES

MURBORNE STONE

STATE OF ALABAMA,

BALDWIN COUNTY.

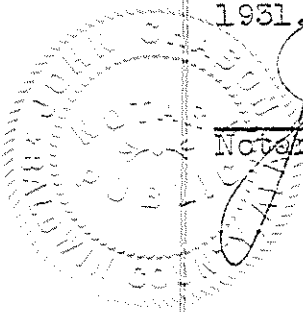
Before me, a Notary Public in and for said County in said State, personally appeared W. M. Stuart, who is known to me and who after being by me first duly and legally sworn doth depose and say under oath as follows:-

That his name is W. M. Stuart; that he is President and Agent of and for the Peoples Fertilizer Company, a Corporation, and as such is duly authorized to make this Affidavit; that he is fully acquainted with the books of account of the said Peoples Fertilizer Company and that the foregoing and annexed itemized account between the Peoples Fertilizer Company, a Corporation, and W. J. Hall, is true and correct and that after allowing all just credits the sum of One Hundred Two & 40/100 Dollars (\$102.40) with interest, is still due and unpaid.

W. M. Stuart

Sworn to and subscribed before me,  
a Notary Public whose seal is here-  
to affixed, this 28th day of July,  
1931.

John C. Hagan  
Notary Public, Baldwin County,  
State of Alabama.



Mr. W. J. Hall.

Bay Minette, Ala.

IN ACCOUNT WITH

# Peoples Fertilizer Co.

HIGH GRADE FERTILIZER

Foley, Ala.

Phone 7010

Bay Minette, Ala.

Phone 74

1927							
Sept.	12	#675	.15 tons	9-4-4	@ 36.00		5.40
1928							
April	12	#947	1.5	"	9-4-4	@ 40.00	60.00
"	18	#962	.5	"	8-3-5	@ 37.00	18.50
May	8	#998	.5	"	8-3-5	@ 37.00	18.50
<del>xxxxxx</del>							
1929							
June	1	3331	.9	"	Nit. of Soda	@ 50.00	45.00
							\$ 147.40

## Credits.

1929							
July	10	By Check					45.00
							\$ 102.40