

4039

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Ed Kirby to appear and plead, answer or demur, within thirty days from the service of this writ, to a Bill of Complaint filed against him in Circuit Court, at Law, for said County and said State, by Prince E. Griffin, d/b/a Standard Service Station, and at the same time and place to make return of your actions hereunder.

Given under my hand this the 5th day of November, 1959.

CLERK OF COURT

PRINCE E. GRIFFIN, d/b/a
STANDARD SERVICE STATION.

Plaintiff

VS.

ED KIRBY,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

Plaintiff claims of the Defendant the sum of \$134.03, due from him by account on, to-wit, July 17, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT TWO:

Plaintiff claims of the Defendant the sum of \$134.03, due from him for merchandise, goods and chattels, sold by Plaintiff to Defendant, at his request, on, to-wit, July 17, 1959, which sum of money, with interest thereon, is still unpaid. *Li*

ATTORNEY FOR PLAINTIFF

Verified itemized statement
of account attached to original.

FILED

NOV 5 1959

ALICE J. DUCK, Clerk

4039
PRINCE E. GRIFFIN, d/b/a
STANDARD SERVICE STATION,

Plaintiff

vs.

ED KIRBY,

Defendant

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Defendant's Address:
Rural Route, Fairhope,
Alabama

Fairhope, Ala.

FILED

NOV 5 1959

WILLIE L. DUCK, Clerk

Received 6 day of Nov 1959

and on 31 day of Dec 1959

I served a copy of the within Doc

on Ed Kirby

By service on _____

TAYLOR WILKINS, Sheriff

By Stedham D. S.

Fairhope, Ala

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY Ed
DEPUTY CLERK

Est. 7/24/59

FAIRHOPE, ALABAMA

7-17-1959

IN ACCOUNT WITH

STANDARD SERVICE STATION

P. E. GRIFFIN

Mr Ed Kirby
Bural, Rt.
Fairhope, Ala.

Tires 59 BATTERIES ACCESSORIES OUTBOARD MOTORS

1	31	Gas, oil, valve cover gasket	5	30
2	1	Gas		36
2	2	"	4	45
2	4	oil		30
2	3	anti freeze + drain rock	2	25
2	4	light repair		160
2	8	Gas		262
2	7	oil, gas filter		735
2	9	Gas, oil		800
2	20	Springs + labor	6	06
2	20	Gas		143
2	21	oil + oil		460
2	22	wash		100
2	28	Gas, oil		305
3	5	Gas		400
3	6	Gas, wash		652
3	8	Gas + oil		429
3	13	Gas, oil, repair		735

\$134.03

State of Alabama - Baldwin County,

Before me, the undersigned authority, personally appeared Prince E. Griffin, who, after being first duly sworn, deposes and states that the foregoing is a true and accurate statement of the account owed and that there are no off-sets or counter-claims against the same.

Prince E. Griffin
PRINCE E. GRIFFIN

Sworn and subscribed before me this 5th day of November, 1959.

Allen Bailey
NOTARY PUBLIC, BALDWIN
COUNTY, ALABAMA