

41106

C O M P L A I N T

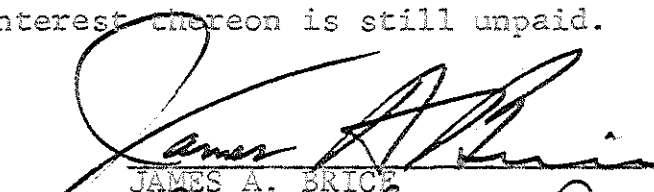
EQUIPMENT SALES CORPORATION,) IN THE CIRCUIT COURT OF
PLAINTIFF,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW.
LONNIE STEWART, individually,)
and d/b/a BEACHCOMBER MOTEL)
COTTAGES,)
DEFENDANT.)

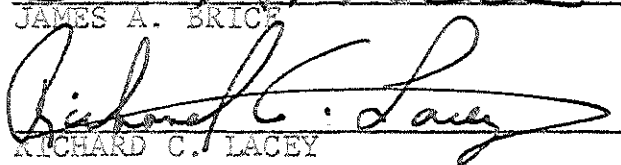
COUNT ONE

The Plaintiff claims of the Defendant the sum of ONE THOUSAND FOUR HUNDRED SIXTY TWO AND 25/100 (\$1,462.25) DOLLARS, due from him on account, to-wit: the 20th day of August, 1959, and which sum of money with interest thereon is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant the sum of ONE THOUSAND FOUR HUNDRED SIXTY TWO AND 25/100 (\$1,462.25) DOLLARS, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit: the 20th day of July, 1959, which sum of money with interest thereon is still unpaid.


JAMES A. BRICE


RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

The Defendant resides at Gulf Shores, Alabama.

FILED

DEC 17 1959

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon LONNIE STEWART

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, State of Alabama, at Bay Minette, against LONNIE STEWART,
individually, and d/b/a BEACHCOMBER MOTEL COTTAGES, Defendant

by EQUIPMENT SALES CORPORATION

....., Plaintiff.....

Witness my hand this 17 day of dec 1959

Ed 12-28-59

Reice French Clerk

RECORDED

No. 4106

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

EQUIPMENT SALES CORPORATION

Plaintiffs

vs.

LONNIE STEWART, individually
and d/b/a BEACHCOMBER MOTEL
COTTAGES

Defendants

SUMMONS and COMPLAINT

Filed **FILED**, 19

DEC 17 1959

ALICE J. DUCK, CLERK
REGISTER

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Lucy Stewart
RECEIVED IN OFFICE

12/17, 1959

Sheriff

I have executed this summons

this 28, Dec, 1959

by leaving a copy with

Lonnie Stewart

Sheriff claims 100 miles at
Ten Cents per mile Total 10.00
TAYLOR WILKINS, JR.
BY *CC* DEPUTY SHERIFF

Darrell Wilkins Sheriff

Charles D. Wilkins Deputy Sheriff

Lucy Stewart