

S U M M O N S

STATE OF ALABAMA
COUNTY OF BALDWIN

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

TO ANY SHERIFF OF THE STATE OF ALABAMA - - - - GREETINGS:

You are hereby commanded to summons Cyrus Nelson to appear before the Circuit Court of Baldwin County, Alabama, to be held for said County at the place of holding same, within thirty (30) days from service of this process then and there to answer the complaint of Coleman Marine & Hardware, LTD., a co-partnership, composed of James P. Coleman and John Ray Nelson.

WITNESS my hand this the 24 day of Dec, 1959.

CIRCUIT CLERK

* * * * *

COMPLAINT

COLEMAN MARINE & HARDWARE, LTD.,
a co-partnership, composed of
James P. Coleman and John Ray
Nelson.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

PLAINTIFF,

VS.

CYRUS NELSON,

DEFENDANT.

I.

The Plaintiff claims of the Defendant One Hundred Twenty One and 84/100 (\$121.84) Dollars, due from him on account, to-wit: the 12th day of July, 1958, which sum of money, with interest thereon is still unpaid.

II.

The Plaintiff claims of the Defendant One Hundred Twenty One and 84/100 (\$121.84) Dollars, due from him on account for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: the 12th day of July, 1958, which sum of money, with interest thereon is still unpaid.

FILED

DEC 28 1959

ALICE J. D.

~~JAMES A. BRICE~~

RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

There is attached hereto as Exhibit "A" and made a part hereof, an itemized statement of account verified by James P. Coleman, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 12th day of July, 1958, and due at present.

The Defendant resides in Bon Secour, Alabama.

FILED
DEC 28 1959
ALICE J. DUCK, Clerk

A F F I D A V I T

STATE OF ALABAMA)

COUNTY OF BALDWIN)

Before me, Richard C. Lacey, a Notary Public in and for said County, in said State, personally appeared James P. Coleman, who, being first duly sworn by me, deposes and says: that he is a co-partner of Coleman Marine & Hardware, Ltd.; that the annexed statement of account of said Coleman Marine & Hardware, Ltd., against Cyrus Nelson, is just, true, and correct; that there is now due on said account One Hundred Twenty One and 84/100 (\$121.84) Dollars after deducting all credits, set-offs or counterclaims.


JAMES P. COLEMAN

Sworn to and subscribed before me on this
the 23 day of December, 1959.


NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

FILED

DEC 28 1959

ALICE J. DUCK, Clerk

STATEMENT

FROM Coleman Marine & Hardware, Ltd.

Foley, Ala.

December 2 19 59

TO Mr. Cyrus Nelson

ADDRESS

CITY Bon Secour, Ala.

TERMS

Due 8 - 1 - 1958

\$121.84

Received 28 day of Dec 1959
and on 18 day of Jan 1960
served a copy of the within 92C
on Cyrus Nelson
by service on _____

TAYLOR WILKINS, Sheriff
[Signature] D. S.

[Signature]

Sheriff claims 86 miles at
Ten Cents per mile Total \$ 8.60
TAYLOR WILKINS, Sheriff
BY CC DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COLEMAN MARINE & HARDWARE, LTD., a
co-partnership, composed of James
P. Coleman and John Ray Nelson

PLAINTIFF

VS.

CYRUS NELSON,

DEFENDANT

FILED

DEC 28 1959

ALICE J. DUCK, CLERK
REGISTER

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA