

JOHN P. BEEBE
ATTORNEY AT LAW
ROBERTSDALE, ALABAMA

4119

December 28th, 1959

Mrs. Alice J. Duck, Clerk,
Circuit Court, Baldwin County,
Bay Minette, Alabama.

Dear Mrs. Duck:

I enclose a summon and complaint in duplicate in the matter of George Poos, vs. Vurnie Sluder, with the request that it be docketed and placed in the hands of the Sheriff for service.

The defendant is a resident of the City of Fairhope, and has been doing some work for Klumpp, however I do not think that he is at present employed by Mr. Klumpp.

Yours very truly,

John P. Beebe

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon VURNIE SLUDER 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 GEORGE POOS, operating under the name and style of R. & R. Service Shop.

Witness my hand this the 29 day of December, 1959.

Alice J. Duck
Clerk, Circuit Court, Baldwin County,
Alabama.

GEORGE POOS, operating under
the name and style of R. & R.
Service Shop,

Plaintiff,

vs

VURNIE SLUDER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FIRST: The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY NINE & 90/100 (\$159.90) DOLLARS, due from him by account on the 1st day of October, 1959, which sum of money with interest thereon, is still unpaid.

SECOND: The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY NINE & 90/100 (\$159.90) DOLLARS, on account stated between the Plaintiff and the Defendant on the 1st day of October, 1959, which sum of money with interest thereon, is still unpaid.

THIRD: The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY NINE & 90/100 (\$159.90) DOLLARS, for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit: the 18th day of September, 1959, which sum of money with interest thereon, is still unpaid.

FILED

DEC 29 1959

ALICE J. DUCK, CLERK
REGISTER

John P. Beebe
Attorney for Plaintiff

No. 4119

Received 29 day of Dec 1952
and on 14 day of Jan 1960
served a copy of the within
on Vurnie Sluder
by service on _____

TAYLOR WILKINS, Sheriff

By W. C. Barnes D. S.

5 mi to Hope

Sheriff claims 80 miles at

Ten Cents per mile Total \$ 8.00

TAYLOR WILKINS, Sheriff

BY Barnes
DEPUTY SHERIFF

GEORGE POOS, operating
under the name and style
of R. & R. Service Shop,
Plaintiff,

vs

VURNIE SLUDER,
Defendant.

Fairhope
Wm Klump Motor
Co

Summons and Complaint

FILED

DEC 29
ALICE I. DUCK, CLERK
REGISTER