

C O M P L A I N T

BON SECOUR FISHERIES,  
INCORPORATED,

PLAINTIFF,

VS.

RANDAL MANDERS,

DEFENDANT.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW.

I.

The plaintiff claims of the defendant One Hundred Fifty Four and 54/100 (\$154.54) Dollars, due from him on account, to-wit: the 30th day of September, 1958, which sum of money, with interest thereon, is still unpaid.

II.

The plaintiff claims of the defendant One Hundred Fifty Four and 54/100 (\$154.54) Dollars, due from him for merchandise, goods and chattels, sold by the plaintiff to the defendant on, to-wit: the 30th day of September, 1958, which sum of money, with interest thereon, is still unpaid.

  
ATTORNEY FOR PLAINTIFF

There is attached hereto as Exhibit A and made a part hereof, an itemized statement of account verified by affidavit of Al Reak, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 30th day of September, 1958, and due at present.

The defendant resides at Fairhope, Alabama.

FILED

JAN 22 1960

WILLIE L. DICK, CLERK  
REGISTER

## Statement

DATE 1-8-60Randal MandusI'lope, Ala

In Account With

**BON SECOUR FISHERIES**

Phone WH 3-7531 — WH 3-3854

BON SECOUR, ALABAMA

Date	Invoice No.	Debit	Credit	Balance
1958				
Apr 14		200 00		
July 2		4 54		
X Sept 30			50 00	154 54

A F F I D A V I T

STATE OF ALABAMA     )

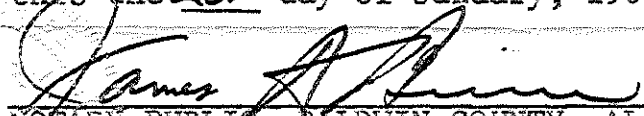
COUNTY OF BALDWIN    )

Before me, the undersigned Notary Public, in and for said County and State, personally appeared Al Rea, who, being by me first duly sworn, deposes and says:

That he is Bookkeeper for Bon Secour Fisheries, Incorporated; that the annexed statement of the account of the said Bon Secour Fisheries, Incorporated against Randal Manders is just, true and correct; that there is now due on said account the sum of One Hundred Fifty Four and 54/100 (\$154.54) Dollars, after deducting all credits, set-offs or counterclaims.

  
AL REA

Sworn to and subscribed before me on  
this the 20th day of January, 1960.

  
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon RANDAL MANDERS

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 RANDAL MANDERS

-----, Defendant.-----

by BON SECOUR FISHERIES, INCORPORATED

-----, Plaintiff.-----

Witness my hand this 22 day of JANUARY 19 60

Alice J. Luck, Clerk

No. 4152 Page 751 English Ave  
Michigan Ave

# STATE of ALABAMA

Baldwin County

## CIRCUIT COURT

BON SECOUR FISHERIES,

INCORPORATED

Plaintiffs

vs.

RANDAL MANDERS

Defendants

### Summons and Complaint

Filed 19

**FILED**  
JAN 22 1960

CLERK  
REGISTER

Clerk

JAMES A. BRICE

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Parsons  
Received In Office

19

Sheriff.

I have executed this summons

this 1-29

1960

by leaving a copy with

Randal Manders

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY Edleigh Steadman

DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Edleigh Steadman

Deputy Sheriff.