

EMMETTE BAUGHER, Individually
and d/b/a FAIRHOPE FEED AND SEED.
Co.
Plaintiff

-VS-

J. D. CALLOWAY,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

41154

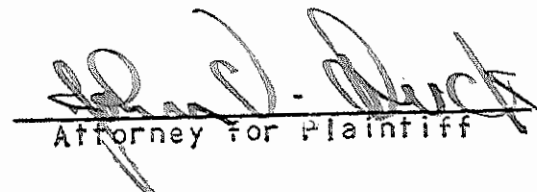
BILL OF COMPLAINT

Count One:

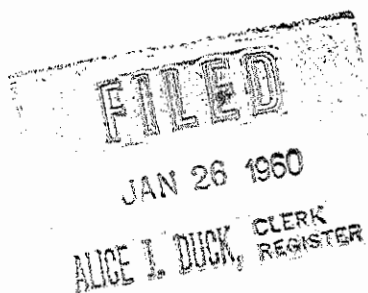
Plaintiff claims of the Defendant the sum of TWO HUNDRED SEVENTY-NINE and 18/100 (\$279.18) Dollars, due from him by account on to-wit; the 20th day of January, 1958, which sum of money with the interest thereon, is still unpaid.

Count Two:

Plaintiff claims of the Defendant the sum of TWO HUNDRED SEVENTY-NINE and 18/100 (\$279.18) Dollars, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant from on to-wit: the 20th day of January, 1958, until on to-wit; the 29th day of May, 1959, which sum of money with the interest thereon, is still unpaid.


Attorney for Plaintiff

Defendant resides at:
Fairhope, Alabama



SUMMONS AND COMPLAINT

Moore Ptg. Co.

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 J. D. CALLOWAY

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-----

J. D. Calloway-----, Defendant--

by EMMETTE BAUGHER, Individually and d/b/a FAIRHOPE FEED AND
SEED COMPANY-----, Plaintiff--

Witness my hand this 26 day of January 1960

W. J. Renshaw-----, Clerk

BY 1-29-60

No. 4154 Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

EMMETTE BAUGHER, Individually

and d/b/a FAIRHOPE FEED AND SEED.

Co.

Plaintiffs

vs.

J. D. CALLOWAY

Defendants

Summons and Complaint

Filed

FILED

19

JAN 26 1960

Clerk

ALICE J. DUCK, CLERK
REGISTER

John V. Duck

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Fairhope, Ala.

Received In Office

1/26 19 60

Sheriff

I have executed this summons

this 1-29 19 60

by leaving a copy with

J. D. Calloway

Sheriff claims 70

Ten Cents per mille Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff
Edleigh Strickland Deputy Sheriff

386 Fairhope Ave.

WA 8-8960

JOHN V. DUCK
ATTORNEY AT LAW
FAIRHOPE, ALA.

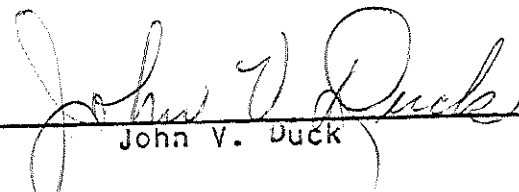
Jan. 24th, 1960

Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Ala.

Dear Miss. Alice:

Enclosed you will find two bill of complaints.
Please file and send to sheriff.

Sincerely,


John V. Duck

JVD:og
Encl: