

W.B.Paterson, doing business  
as the Paterson Mercantile Co.,

Versus.

William H. Dean and J.C. Dean  
and W.H. Dean and Son.

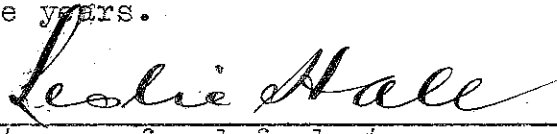
:  
:  
: Circuit Court,  
:  
: Fall Term, 1915.  
:  
:

Come the defendants and for answer to the Plaintiff's  
Complaint and separately to each count thereof, plead each  
of the following pleas:-

First: The allegations of the complaint are untrue.

Second: That they have paid the debt or demand upon which  
this action is based before the institution of this suit.

To the first and third counts of the  
complaint, they say that this action is barred by the  
Statute of Limitation of three years.

  
\_\_\_\_\_  
Attorney for defendants.

W.B. Paterson, doing  
business as Paterson  
Merchandise Co

to  
William H Dean &  
J.B. Dean &  
W.H. Dean & Son

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Deas

Patented Nov 29/1915  
J.W. Richmond  
Clerk

Leslie Hall  
Clerk for Fifth

SUMMONS AND COMPLAINT

The State of Alabama, }

Baldwin County. }

No. \_\_\_\_\_

CIRCUIT COURT.

Fall Term, 1915

To any Sheriff of the State of Alabama:

You are hereby commanded to summon WILLIAM H. DEAN and J. C. DEAN, Individually, and as co-partners doing business under the firm name and style of W. H. DEAN & SON, to appear at the next term of the Circuit Court to be held for said County at the place of holding the same, then and there to answer the complaint of

W. B. PATERSON,

doing business as the PATERSON MERCANTILE COMPANY.

Witness my hand, this 22<sup>nd</sup> day of Oct

1915

Clerk

COMPLAINT

W. B. PATERSON, doing business

as the PATERSON MERCANTILE CO.

Plaintiffs

vs,

WILLIAM H. DEAN and J. C. DEAN

Individually, and as co-partners

doing business under the name

and style of W. H. Dean

& Son, Defendants.

1. The plaintiff claims of the Defendant

FOUR HUNDRED AND THREE and 32/100 ----- Dollars, due from them by account between the Defendants and the Plaintiff on to-wit the 15th day of December, 1909, which sum of money with the interest thereon is still unpaid.

2. The Plaintiff claims of the Defendants Four Hundred and Three and 32/100 Dollars due from them to Plaintiff on account stated between Defendant and Plaintiff on to-wit the 1st day of January, 1910, which sum of money with the interest thereon is still unpaid.

3. The Plaintiff claims of Defendant Four Hundred and Three and 32/100 Dollars due from them to Plaintiff for merchandise, goods and chattels sold by Plaintiff to Defendant on to-wit the 1st day of January, 1910., which sum of money with the interest thereon is still unpaid.

The account upon which this action is based is verified by affidavit on file in this cause.

Plaintiffs Attorney

No. ....

**The State of Alabama,**

**Baldwin County.**

**CIRCUIT COURT.**

*W. B. Paterson*

vs. Plaintiffs.

*H. H. Dean & Son*

Defendants.

**SUMMONS AND COMPLAINT.**

Filed *Oct 22* 191*5*

*J. M. McIlwain* Clerk.

Defendant lives at

*R. S. Kirby & Austin*  
Plaintiff's Attorney.

Defendant's Attorney.

THE BALDWIN TIMES PRINT

Received in office

*Oct 22* *nd*, 191*5*

*C. E. Eubanks* Sheriff

I have executed this Writ

this *29 day* *OCT* 191*5*  
by leaving a copy of the within sum-  
mons and complaint with

*The within names*  
*Deft H. H. Dean and*  
*J. L. Dean*

*C. E. Eubanks* Sheriff

*B. J. Andrews* Deputy Sheriff

Mrs. H. (F C) Olsen

Dr to

W B Paterson Mer. Co  
Daphne Ala.

1909

Oct 1	To balance	143.86
Nov 6	to bal on fertz	1.00
" 9	1 gal oil	.15
	salt	.05
	oat-meal	.25
	cheese	.10
" 11	2 syrup bbls	5.20
		<u>150.61</u>
	Credit	
Nov 13	by cash	5.20
	Balance 11/09	<u>\$145.41</u>

81.24

227.15

Due to Mrs. H. Olsen

145.41

11.62

81.24

STATE OF ALABAMA,)

MOBILE COUNTY. ) Before me, Blanche P. Vestal, a Notary  
Public in and for said State and County,  
personally appeared this day Harry G. Holland, who, being sworn,  
says that he knows of his own personal knowledge that the fore-  
going account and each item thereof is true and correct and that  
the sum of \$145<sup>44</sup> with the interest thereon, after allowance  
of all proper credits, is due from Mrs. H. Olun  
to the Paterson Mercantile Company, and is unpaid.

H. G. Holland

Subscribed and sworn to before me this  
the 18th day of October, 1915.

Blanche P. Vestal  
Notary Public, Mobile County, Alabama.

No 1223.

Paterson Mercantile Co

Trus St Clear

Verifia acc

Filed 11/29/1915  
T. W. Williams  
Clear

NOTED BY THE PATENT OFFICE  
THE 1915 PATENT OF OCTOBER 1915  
EXHIBITED AND BOUND TO THE PATENT OFFICE

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