

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

MRS. H. OLSON

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 22nd day of Oct 1915

[Signature] Clerk

COMPLAINT

W. B. PATERSON, doing business
as the PATERSON MERCANTILE CO.,
Plaintiffs

vs,

MRS. H. OLSON,
Defendants

1. The plaintiff claims of the Defendant
ONE HUNDRED AND FIFTY-NINE and 39/100 - - - - Dollars, due
from her by account between the Defendant and the Plaintiff
on to-wit the 13th day of November, 1909, which sum of
money with the interest thereon is still unpaid.
2. The Plaintiff claims of the Defendant One Hundred and Fifty-
nine and 39/100 Dollars due from her to Plaintiff by account
stated between Plaintiff and Defendant on to-wit, the 1st day
of December, 1909, which sum of money with the interest
thereon is still unpaid.
3. The Plaintiff claims of the Defendant One Hundred and Fifty-
nine and 39/100 Dollars due from Defendant to Plaintiff for
merchandise, goods and chattels sold by Plaintiff to Defendant
on to-wit the 1st day of December, 1909, 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.

[Signature]
Plaintiffs Attorney

No. *100*

The State of Alabama,

Baldwin County.

CIRCUIT COURT.

J. B. Patterson

vs.

Plaintiffs.

Wm. H. Olsen

Defendants.

SUMMONS AND COMPLAINT.

Filed *22nd Oct* 191*5*

J. M. McInnis Clerk.

Defendant lives at

Daphne

Paul C. Conley & Associates
Plaintiff's Attorney.

Defendant's Attorney.

THE BALDWIN TIMES PRINT

Received in office

Oct 22nd

191*5*

C. E. Embank Sheriff

I have executed this Writ

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

Wm. H. Olsen

C. E. Embank Sheriff

G. T. Andrews Deputy Sheriff

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

Circuit Court,

Versus.

Fall Term 1915.

Mrs. H.Olsen.

Comes the defendant and for answer to the Plaintiff's
Complaint and separately to each count thereof, pleads each
of the following pleas:-

First.- The allegations of the complaint are untrue.

Second.- That she has 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, she ^{further} says
that this action is barred by the Statute of Limitation of
three years.

Leolie Hall

Attorney for defendant.

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

10
Mrs. H. Olsen

Please.

Filed Nov 29/31
T. W. Richardson
Clerk

Leslie Hall
Atty for Defendant