

STATE OF
COUNTY

ALABAMA, }
MOBILE. }

Before me, the undersigned authority, personally appeared James Donahue

known to me, who being duly sworn, upon his oath states that he is bookkeeper employed by
of McDonnell Bros. Inc., a corporation

a corporation organized and doing business under the laws of Alabama
a partnership composed of

a sole trader doing business as

and that as such he makes this affidavit: that he is familiar with the books and business of said

McDonnell Bros. Inc., a corporation

that the attached account against A. A. Trione

is just and correct, and within the personal knowledge of this affiant; that the items thereon stated and composing the
said account were sold and delivered to said A. A. Trione

at the special instance and request of said debtor, and that credit has been duly given for all payments and just and
lawful offsets to which said account is entitled as thereon stated, and that the balance thereof, amounting to the sum of

\$158.51

Dollars (\$) with interest

from July 5, 1930 19 , is justly due and remains unpaid.

Sworn to and subscribed before me on this the 3rd day of December 1931.

Bohling, Notary Public.

STATEMENT

MOBILE, ALA. Nov 21 1931Mr. A. A. TrioneStephen Ah

TO McDONNELL BROS. INC. DR.

"JERSEY QUEEN" FLOUR

PLAIN AND SELF-RISING
MADE FROM CHOICEST WHEAT

TERMS

15 AND 17 SO. COMMERCE STREET

1929								
Nov	8	32-12	2 Fl 2	900	1800			
		8-24	2 Fl 1	870	870			
		2-96	Meal	270	540	321	0	
Dec	23	8-24	2 Fl 1	870	870			
		16-12	2 Fl 1	900	900			
		4-96	Meal	270	1080			
		2 Rls	Self Rising	535	1070	39	20	
1930								
Jan	9	8-24	2 Fl 1	870	870			
		16-12	2 Fl 1	900	900			
		2-98	1/2 RS Fl 1	670	670			
		3 Rls	Self Rising	300	545	163	5	40 75
Jan	22	8-24	1/2 RS Fl 1	725	725			
		16-12	1/2 RS Fl 1	755	755			
		5 Rls	Self Rising	250	1250			
		3-96	Meal	260	780			
		2 Rls	Self Rising	300	545	1090	4600	

STATEMENT

MOBILE, ALA. Dec 2 1931Mr. A A TrianeSophies

TO McDONNELL BROS. INC. DR.

"JERSEY QUEEN" FLOUR

PLAIN AND SELF-RISING
MADE FROM CHOICEST WHEAT

TERMS

15 AND 17 SO. COMMERCE STREET

1930

Aunt brat Fawc

15805

Jan 30 5 R 1/2 Can 8 1/2 Can 8 1/2 Can 8 1/2 250 1250

5 R 1/2 24 1/2 Can 8 1/2 270 1350

3 R 1/2 8 1/2 1/2 Can 8 1/2 235 705

2-98 R 1/2 20 1/2 670 670

8-72 R 1/2 20 1/2 700 700

8-72 1/4 20 1/2 700 700 5375

Credits

Feb 24 24 Can 8 1/2 20 1/2 10590

24 " " 20 1/2 10590

21180

10590

10590 21180

STATEMENT

MOBILE, ALA. Dec 2 1931M. A. A. TrioneDaphne Ala

TO McDONNELL BROS. INC. DR.

"JERSEY QUEEN" FLOUR

PLAIN AND SELF-RISING
MADE FROM CHOICEST WHEAT

TERMS _____

15 AND 17 SO. COMMERCE STREET

1930							
July	25	4 BLS 85' Jiffy Brown Flour	235	9	40		
	4	-100 lb Grl Sugar	400 535	21	40		
	5	-100 lb Corn Meal	250	12	50		
	3	-100 lb Corn Laying Mash	310	9	30		
	1	-98 lb 2 S Flour	670	3	35		
	16	-12 1/2 lb 2 S Flour	1 900	9	00		
	16	-12 1/2 lb 2 S Flour	1 730	7	30		
	2	-100 lb Old Figs	200	4	00	76	25
Aug	1	2 BLS 11 Rice	200 4 1/2	9	00	9	00
	14	3 BLS 85' Jiffy Brown Flour	235	7	05		
		2-96 lb Meal	250	5	00		
	8	-24 lb 2 S Flour	690	6	90		
	16	-12 lb 2 S Flour	1 720	7	20		
	3	BLS Grl Sugar	300 530	15	90	42	05
						12	73 0
26		check charges		10	59 0		
26		" " "		10	59 0	21	18 0

STATEMENT

MOBILE, ALA. Dec 3 1931M₁ A A TrioneSaphire Ala

TO McDONNELL BROS. INC. DR.

"JERSEY QUEEN" FLOUR

PLAIN AND SELF-RISING
MADE FROM CHOICEST WHEAT

TERMS

15 AND 17 SO. COMMERCE STREET

1930Am't bro't xar'd33910June 5 Cash

5000

July 3 "

5000 10000

23910

July 5 2-96 Meal 235

470

470

24380Dec 30 Chas Asta

2500

1931 30 Chas Asta

2500

1930 25 Chas Asta

851

5851302311930 Oct 22 Cash

2500

1931 26 "

2500

1931 21 "

2500

June 15 "

2500

July 30 "

2500

Oct 17 "

1880

1438015851

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. AT LAW.

McDonnell Bros. Inc.,
a corporation,

Plaintiff,

versus

A. A. Trione,

Defendant.

Count One.

from him Plaintiff claims of the defendant the sum of ^{\$158.51} balance due on account between plaintiff and defendant, for goods, wares, and merchandise sold by the plaintiff to the defendant, at his instance and request, on and between, to wit, November 8, 1929, and July 5, 1930, as shown by itemized statement of account, verified by affidavit, hereto annexed, which said sum, together with the interest thereon, is due and unpaid.

Count Two.

due from him Plaintiff further claims of the defendant the sum of \$158.51 by account stated by and between the plaintiff and defendant, on, to wit, July 5th, 1930, which said sum, together with the interest thereon, is due and unpaid.

A. S. Whiting
A. S. Whiting,
Attorney for Plaintiff,
State Office Building,
Mobile, Alabama.

Note:

The defendant is said to reside at Daphne, Alabama, and to operate a store at that place.

Original
No. _____
At Law.

IN THE CIRCUIT COURT
BALDWIN COUNTY,
ALABAMA.

McDonnell Bros. Inc.,
a corporation, Plaintiff,

vs.

A.A. Trione,
Defendant.

COMPLAINT.

Filed Dec 4th 1931
D. H. Rimmer
Clerk

A.S. Whiting, Attorney for
Plaintiff, State Office Bldg.,
Mobile, Alabama.

The State of Alabama, Baldwin County

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon A.A. Trione,

to appear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of Mc Donnell, Bros Inc., a corporation.

Witness this 4th day of December, 19 51.

D.W. Riccio, Clerk.

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT.

COMPLAINT

VS.

Plaintiff

Defendant

And the Plaintiff claim of the Defendant.

Dollars, due

Original
No.

The State of Alabama

County

CIRCUIT COURT

Mc Donnell, Inc., a
corporation,

Plaintiff

vs.

A.A. Trione,

Defendant

Summons and Complaint

Filed this 4th day of
December, 1931.

J. M. Riccio
Clerk.

A.S. Whiting, (Mobile Ala)
Plaintiff's Attorney.

Received this day
of, 19.....

....., Sheriff.

Executed this 11th day
of December, 1931, by
leaving a copy of the within Summons and Com-
plaint with

A. A. Trione
Defendant

W. R. Stuart
Sheriff.

W. Percy Hall
Deputy Sheriff

The State of Alabama,

COUNTY

To the Sheriff of County:

Whereas, the Plaintiff..... in the within stated
cause ha..... made affidavit and given bond as
required by law, you are hereby required to
take the property mentioned in the complaint
into your possession, unless the Defendant.....
give..... bond payable to the Plaintiff..... with
sufficient surety in double the amount of the
value of the property, with condition that if the
Defendant

cost in the suit,
within thirty days thereafter, deliver the property
to the Plaintiff....., and pay all costs and damages
which may accrue from the detention thereof.

....., Clerk.

McDONNELL BROTHERS, INC.,
A Corporation,

Plaintiff,

-VS-

A. A. TRIONE,

Defendant.

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Comes the Defendant in the above styled cause and demurs to the Original Complaint filed in said cause and to each and every Count thereof, separately and severally, and as grounds of demurrer says:-

FIRST:-

That said Complaint does not allege that the amount sued for is due by Defendant to Plaintiff.

SECOND:-

That in Count 1 of said Complaint the amount claimed by said Plaintiff is vague and indefinite in that it cannot be ascertained from said Count 1 of said Complaint what amount is sued for.

THIRD:-

For that Count 2 of said Complaint does not allege that Defendant is due Plaintiff any sum of money.

Hylbert, Head & Phason
Attorneys for Defendant.

DEFENDANT DEMANDS TRIAL OF
THIS CAUSE BY JURY.

Hylbert, Head & Phason
Attorneys for Defendant.