MID-SOUTH CHEMICAL CORP-ORATION, a corporation,

Plaintiff, I IN THE CIRCUIT COURT OF

VS

BALDWIN COUNTY, ALABAMA

HAROLD C. GUNNISON,

Defendant.

## COMPLAINT

## COUNT I

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY-FIVE and 72/100 (\$335.72) Dollars due from him by account on, to-wit, the 30th day of May, 1959; which sum of money with the interest thereon is still unpaid.

## COUNT II

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY-FIVE and 72/100 (\$335.72) Dollars due from him for merchandise and goods sold by the Plaintiff to the Defendant on, to-wit, the 30th day of May, 1959; which sum of money with the interest thereon is still unpaid.

### COUNT III

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY-FIVE AND 72/190 (\$335.72) Dollars, due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 30th day of May, 1959; which sum of money with the interest thereon is still unpaid.

Attorney for the Plaintiff

NOTE: The account sued on is evidenced by an itemized and verified statement of account filed herewith.

Attorney for the Plaintiff

Defendant's address is: RFD, Box 41 Fairhope, Alabama



## CA INVOICE

Items listed below were sold by the undersigned and this invoice is essigned to:

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STATE OF Tennessee	······································
County of Shelby	***************************************
Personally appeared before me,	Harvey A. Robinson who, being duly sworn,
CREDIT MGR. OF THE FIR	RM OF Mid-South Chemical Corporation
and that the annexed account is jus	et, due, correct and unpaid. That there is now due and
owing thereon from	
to the said	Mid-South Chemical Corporation
the sum of Three Hundred Thirty-Fi	ve and 72/100 for goods
delivered to	at Loxley special instance and request
"That such account is, within the land lawful offsets, payments and cre	knowledge of affiant, just and true and that all just
Sworn to and subscribed before me th	nis 28th day of, October 19 60
My Commission Expres Jan. 20, 1964	- Drawey By Blinish
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The State of Alabama,	Circuit Court, Baldwin	County
Baldwin County.	No.	•
	)	TERM, 19
TO ANY SHERIFF OF THE S	STATE OF ALABAMA	
You Are Commanded to Summon -	HAROLD C. GUNNISON	
	r, within thirty days from the service hereof, to	
/~	HAROLD C. GUNNISON	Defendant
전 1g	MICAL CORPORATION, a corporati	
<u> </u>		, Plaintiff
Witness my hand this	day of 100 19 6	D
	day of Nov 196	Clerk

No. 4440 Page	
	V
STATE of ALABAMA  Baldwin County	Defendant lives at  Box 41  RFD/ Fairhope, Alabama
CIRCUIT COURT	Received In Office
MID-SOUTH CHEMICAL CORP-	
ORATION, a corporation  Plaintiffs	Sheriff,
vs. HAROLD C. GUNNISON	I have executed this summons this 15 May by leaving a copy with
Defendants	Harold C. Sumise
Summons and Complaint	
Piled FILED 19.  19.  19.  19.  19.  19.  19.  19.	Sheriff claims 70 — miles at  Ten Cents per mile Total \$  TAYLOR VILKINS, Sheriff  BY DEPUTY SHERNE
E. G. RICKARBY	
ATTORNEY AT LAW	
P. O. BOX 71  Fairhope, Alabama  Plaintiff's Attorney	Laylar Juillain
Defendant's Attorney	Sheriff,
	Deputy Sheriff.

## E. G. RICKARBY

392 FAIRHOPE AVENUE FAIRHOPE, ALABAMA November 7, 1960

Mrs. Alice Duck Clerk of Circuit Court Bay Minette, Alabama

Dear Mrs. Duck:

Mid-South Chemical Corp. Harold C. Gunnison RE:

Account: \$335.72 Our File: 5229

Enclosed find Summons and Complaint, together with court costs in the sum of \$25.00 in the above mentioned cause.

Please process and oblige.

Yours very truly,

EGR/wr

Enc:

cc: (dup) Client
11/21/60