

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Girard Dade to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of Crystal Ice Company, a partnership composed of J. D. Quinlivan and Mrs. Clara Q. Mullen.

Witness my hand this 20 day of January, 1961.

*Alice J. Duck*  
Clerk

CRYSTAL ICE COMPANY, a partner- X  
ship composed of J. D. QUINLIVAN X  
and MRS. CLARA Q. MULLEN, X  
X  
Plaintiff, X  
X  
vs. X  
X  
GIRARD DADE, X  
X  
Defendant. X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

4564

COUNT ONE:


The Plaintiff claims of the Defendant the sum of Six Hundred Seventy Dollars and Seventy-nine Cents (\$670.79) due from him by account on the 4th day of March, 1960, which sum of money with interest thereon is still unpaid.

COUNT TWO:


The Plaintiff claims of the Defendant the sum of Six Hundred Seventy Dollars and Seventy-nine Cents (\$670.79) due from him on account stated between the Plaintiff and the Defendant on the 4th day of March, 1960, which sum of money with interest thereon is still unpaid.

COUNT THREE:

The Plaintiff claims of the Defendant the sum of Six Hundred Seventy Dollars and Seventy-nine Cents (\$670.79) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant from to-wit: August 10, 1959 to March 4, 1960, which sum of money with interest thereon is still unpaid.

  
Attorneys for Plaintiff

An itemized, verified statement of account sued on is attached hereto and made a part hereof.

  
Attorneys for Plaintiff

FILED  
JAN 20 1961  
ALICE J. DUCK, Clerk

Mobile, Ala., January 1, 1961**CRYSTAL ICE COMPANY****ICE-COAL**

DIAL HE 3-3711

P. O. BOX 75

800-806 MONROE STREET

Mr. Girard Dade  
304 White Ave.,  
Fairhope, Ala.

DATE	CHARGES	✓	DATE	CREDITS	✓	BALANCE
<b>1959</b>						
Aug. 10	98.88					
18	84.05					
Sep. 3	111.24					
15	98.88					
Oct. 2	105.06					
16	105.06					
Nov. 11	81.58					
23	67.98					
28	24.72		Dec. 19	285.88		
Dec. 30	61.80					
Jan. 21	61.80					
Feb. 26	24.72					
Mar. 4	30.90					670.79

STATE OF ALABAMA

MOBILE COUNTY

Before me W. G. Clark, a Notary Public in and for Mobile County, Alabama personally appeared J. D. Quinlivan who is known to me and who, after being by me first duly and legally sworn deposes and says under oath as follows:

That he is one of the partners composing the firm of Crystal Ice Company; that the above and foregoing statement of account against Girard Dade is true and correct and that the sum of \$670.79 is now due and unpaid after allowing all just credits and off-sets.

J. D. Quinlivan  
J. D. Quinlivan

Sworn to and subscribed before me on this the 1<sup>st</sup> day of January, 1961.

W. G. Clark  
Notary Public, Mobile County, Ala.

PAY LAST AMOUNT IN  
THIS COLUMN

45764

SUMMONS AND BILL OF COMPLAINT

CRYSTAL ICE COMPANY, a partner-  
ship composed of J.D. QUINN, IVAN  
and MRS. CLARA Q. MULLEN,

Plaintiff,

vs.

GIRARD DADE,

*Tagliapietra,  
White Ave*

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

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FILED

JAN 20 1961

Alice J. Duck, Clerk

CHASON & STONE  
ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA

Received 24 day of Jan 1961  
and on 27 day of Jan 1961  
I served a copy of the within 29 C  
on Donald Wade  
by service on Girard Dade

TAYLOR WILKINS, Sheriff

By W. C. Eamers, S.  
Thope

Sheriff claims 70 miles at  
Ten Cents per mile Total \$ 7.00  
TAYLOR WILKINS, Sheriff  
BY W. C. Eamers  
DEPUTY SHERIFF