

SUMMONS

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon J. A. FULFORD, doing business as BUCK'S POULTRY, to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, Alabama, at the place of holding same by GEORGIA BROILERS, INC., a Georgia corporation,

Witness my hand this the 6th day of February, 1961.

Alice J. Buck  
Clerk  
\* \* \* \* \*  
COMPLAINT  
41587

GEORGIA BROILERS, INC., a  
Georgia corporation,

PLAINTIFF

VS:

J. A. FULFORD, d/b/a BUCK'S  
POULTRY,

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant ONE THOUSAND, NINE HUNDRED FIFTY-ONE & 96/100 DOLLARS (\$1,951.96), due from him by account on, to wit: the 29th day of June, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE THOUSAND, NINE HUNDRED FIFTY-ONE & 96/100 DOLLARS (\$1,951.96), due from him on account stated between the plaintiff and the defendant on, to wit: the 29th day of June, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE THOUSAND, NINE HUNDRED FIFTY-ONE & 96/100 DOLLARS (\$1,951.96), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant, on, to wit: the 29th day of June, 1960, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 30th day of January, 1961.

The defendant's address is:

Gulf Shores, Alabama

% R.O. Burgess

James H. Hester  
Attorney for Plaintiff

FILED  
FEB. 6 1961

ALICE J. BUCK, Clerk

# GEORGIA BROILERS, INC.

Fresh Dressed and Frozen Poultry

350 CALLIOPE STREET

PHONE 523-2914

PHONE 524-4367

NEW ORLEANS 13, LA.

IN ACCOUNT WITH:

J.A. Fulford (a/b/a Buck's Poultry)  
1530 North Claiborne Ave  
New Orleans, La.

DATE	FOLIO	CHARGES	CREDITS	BALANCE PAY LAST AMOUNT IN THIS COLUMN
			BALANCE FORWARDED	
3/5/60	EO03516	Bal Of \$37.34		
3/9/60	EO03638	\$89.03		
3/12/60	EO03875	\$53.94		
3/16/60	EO04042	\$84.84		
3/19/60	EO04231	\$48.16		
3/23/60	EO04408	\$85.96		
3/26/60	EO04603	\$46.76		
4/25/60	EO06170	\$16.50		
5/4/60	EO06650	\$93.24		
5/5/60	EO06743	\$66.92		
5/6/60	EO06748	\$40.48		
5/7/60	EO06901	\$50.68		
5/11/60	EO07026	\$86.36		
5/12/60	EO07134	\$109.72		
5/14/60	EO07227	\$70.68		
5/18/60	EO07425	\$92.80		
5/19/60	EO07475	\$126.39		
5/21/60	EO07624	\$74.53		
5/25/60	EO07834	\$77.14		
5/26/60	EO07921	\$66.70		
5/27/60	EO07984	\$38.31		
5/28/61	EO08045	\$65.25		
CONTINUED--				

Georgia Broilers, Inc. - New Orleans 13, La.


THIS IS OUR WEEKLY STATEMENT

PAYMENT DUE EACH MONDAY AFTER DATE OF PURCHASE.

# GEORGIA BROILERS, INC.

STATEMENT CONTINUED

PAGE 2

DATE	FOLIO	CHARGES	CREDITS	BALANCE
			BALANCE  FORWARDED	
6/1/60	E008186	\$82.36		
6/2/60	E008239	\$63.84		
6/3/60	E008309	\$63.96		
6/4/60	E008402	\$66.08		
6/30/60	E009835	\$64.38		
6/29/60	E009782	\$89.61		
				\$1,951.96

## TERMS

## Fresh Dressed and Frozen Poultry

X162XKAFITEXAVENKX

350 Calliope Street, 3/5/60  
NEW ORLEANS, LA.,

125

M Bucks Poultry

2113 Caton Street

E 003516

TU. 4367

MA. 2914

QUANTITY	COPY	WEIGHT	PRICE	TOTAL
4	Box's "B" Fryers Fresh	227 lbs	29¢	\$65.83
	56-56-55-60	Rec'd on Acct 5/31/60 & applied		\$28.49
				\$37.34
	Signed A Toney.			

S. A. HART  
Manager

TERMS

# GEORGIA BROILERS, INC.

Fresh Dressed and Frozen Poultry

~~XXXXXX XXXX XXXX~~

350 Calliope Street

NEW ORLEANS, LA.,

3/9/60

195

M Bucks Poultry

2113 Caton

INVOICE

E 003638

TU. 4367

MA. 2914

QUANTITY	Copy	WEIGHT	PRICE	TOTAL
5	Box's "B" Fryers Fresh 63-59-70-56-59	307 lbs	29¢	\$89.03
	(Signed Maggie) Same heading. Same address 3/12/60		Invoice # 003875	
3	Box's "B" Fryers Fresh 61-63-62 Signed Maggie	186	29¢	\$53.94
	Same Heading. Same Address .3/16/60		Invoice # E 004022	
5	Box's "B" Fryers Fresh 61-60-71-53-58 Signed "Maggie"	303	28¢	\$84.84
	Same heading. Same address. 3/19/60		Invoice # E004231	
3	Box's "B" Fryers Fresh 58-57-57 Signed "Maggie"	172	28¢	\$48.16

## TERMS

## Fresh Dressed and Frozen Poultry

350 Calliope Street

NEW ORLEANS, LA.

3/23/60

109

M Buck's Poultry

2113 Caton Street

E 004408

TU. 4367

MA. 2914

[illegible]

S. A. HART  
Manager

## TERMS

# GEORGIA BROILERS, INC.

## Fresh Dressed and Frozen Poultry

~~XXXXXXXXXXXXXXXXXXXX~~

350 Calliope Street

NEW ORLEANS, LA.

4/25/60

195

## Buck's Poultry

24

(Pick-up)

# INVOICE

E 006170

TU. 4367

MA. 2914

[illegible]

S. A. HART  
Manager

# GEORGIA BROILERS, INC.

## Fresh Dressed and Frozen Poultry

~~1625 LAFFITE AVENUE~~  
350 Calliope Street  
NEW ORLEANS, LA.,

5/4/60

195

M Bucks Poultry  
2113 Caton Street

## INVOICE

E 006650

TU. 4367  
MA. 2914

QUANTITY	Copies	WEIGHT	PRICE	TOTAL
5	Box's "B" Fryers Fresh 64-68-64-68-69 (Signed "Maggie")	333	28¢	\$93.24
	Same Heading. Same Address. 5/5/60		Invoice # E006743	
4	Box's "B" Fryers Fresh 60-59-60-60 (Signed "Maggie")	259	26¢	\$66.92
	Same heading. Same address. 5/6/60		Invoice # E 006748	
3	Box's P.M. Fryers , Fresh 60-60-56 (Signed "Maggie")	176	23¢	\$40.48
	Same Heading. Same address. 5/7/60	181	Inv #E006901 28¢	\$50.68
	60-60-61 (Signed, "Maggie")		Inv # E007026	
	Same heading. Same address. 5/11/60			
5 Box's	"B" Fryers Fresh 58-60-59-63-63 (Signed J.A. Fulford)	303	28½¢	\$86.36



S. A. HART  
Manager

TERMS

# GEORGIA BROILERS, INC.

Fresh Dressed and Frozen Poultry

~~XXXXX AVENUE~~  
350 Calliope Street  
NEW ORLEANS, LA.,

5/12/60 195

M Bucks Poultry  
2113 Caton Street

INVOICE

E 007134

TU. 4367

MA. 2914

QUANTITY	Copies	WEIGHT	PRICE	TOTAL
4	Box's "B" Fryers Fresh 57-61-66-60	244	28 $\frac{1}{2}$ ¢	\$69.54
3	Box's P.M. Fryers Fresh 59-52-53	164	24 $\frac{1}{2}$ ¢ lb	\$40.08
	(Signed "Dorothy")			
	SAME HEADING. SAME ADDRESS. 5/14/60		Inv #	\$109.72
4	Box's "B" Fryers Fresh 66-63-60-59 (Signed- "Maggie")	248 lbs	E 007227 28 $\frac{1}{2}$ ¢	\$70.68
	Same Heading. Same Address. 5/18/60		Inv #	
5	Box's "B" Fryers Fresh 67-69-65-58-61 (Signed "Maggie")	320	E007425 29¢	\$92.80
	Same Heading. Same address. 5/19/60		Inv #	
4	Box's "B" Frhers Fresh 66-67-65-68	266	E007475 29¢	\$77.14
3	Box's PM Fryers Fresh 69-65-67 (Signed "Maggie")	201 lbs	24 $\frac{1}{2}$ ¢ lb	\$49.25

S. A. HART  
Manager

TERMS

# GEORGIA BROILERS, INC.

Fresh Dressed and Frozen Poultry

~~XXXXXXXXXXXXXXXXXXXX~~

NEW ORLEANS, LA., 5/21/60 195

M Buck's Poultry

2113 Caton Street

INVOICE

E 007624

TU. 4367

MA. 2914

QUANTITY	Copies	WEIGHT	PRICE	TOTAL
4	Box's "B" Fryers Fresh	<del>X257X</del> 257 lbs	29¢	\$74.53
	<del>XXXXXXXXXXXX</del> 63-63-65-66 (Signed "Maggie")		Inv #	
5	Same Heading. Same address. 5/25/60 Box's "B" Fryers Fresh	266 lbs	29¢	\$77.14
	55-54-52-54-51 Signed "Maggie"		Inv #	
4	Same Heading. Same Address. 5/26/60 Box's "B" Fryers Fresh	230	29¢	\$66.70
	57-57-57-59 (Signed "Maggie")		Inv #	
3	Same Heading. Same address. 5/27/60 Box's P.M. Fryers Fresh	163 lbs	23¢	\$38.31
	53-56-54 (Signed "Maggie")		E 007984	

S. A. HART  
Manager

# GEORGIA BROILERS, INC.

Fresh Dressed and Frozen Poultry

XXXXXX WHITE XXXXXXXX

350 Calliope Street

NEW ORLEANS, LA.,

5/28/60

195

M Buck's Poultry

2113 Caton Street

INVOICE

E 008045

TU. 4367

MA. 2914

QUANTITY

Copies

WEIGHT

PRICE

TOTAL

4

Box's "B" Fryers Fresh (under 60#)

225 lbs

29¢

\$65.25

56-56-56-57

(Signed "Maggie")

/Same/Heading./Same/address./5/1/60

Inv #  
E008186/

S. A. HART  
Manager

TERMS

# GEORGIA BROILERS, INC.

Fresh Dressed and Frozen Poultry

~~XXXXXX XXXX XXXX~~

~~1005 LAFITTE AVENUE~~

350 Calliope Street

NEW ORLEANS, LA.,

6/1/60

195

M Buck's Poultry

1520 No Claiborne Ave

INVOICE

E 008186

TU. 4367

MA. 2914

QUANTITY	Copies	WEIGHT	PRICE	TOTAL
5	Box's "B" Fryers Fresh 60-57-55-54-58 Signed ("Maggie")	284 lbs	29¢	\$82.36
	Same heading. Same address. 6/2/60		Inv # E 008239	
4	Box's "B" Fryers Fresh (Signed "Maggie") 59-54-57-58	228 lbs	28¢	\$63.84
	Same Heading. Same Address. 6/3/60		Inv # E 008309	
3	Box's PM Fryers Fresh (63-64-57)	184 lbs	24¢	\$44.16
2	Cases Small loose Eggs Signed "Maggie")	60 doz	33¢	\$19.80
	Same heading. Same address. 6/4/60		Inv # E 008402	
4	Box's "B" Fryers Fresh 56-60-60-60 (Signed "Maggie")	236 lbs	28¢	\$66.08

**Wenger**

## TERMS

# GEORGIA BROILERS, INC.

## Fresh Dressed and Frozen Poultry

~~XXXXXXXXXXXXXXXXXXXX~~

350 Calliope St

NEW ORLEANS, LA. 6/30/60

195

## Buck's Poultry

1530 North Claiborne Ave

# INVOICE

E 009835

TU. 4367

MA. 2914

[illegible]

## TERMS

## Fresh Dressed and Frozen Poultry

~~XXXXXXXXXXXXXXXXXXXX~~

350 Calliope Street

NEW ORLEANS, LA., 6/29/60

195

M Buck's Poultry  
1530 No Claiborne

E 009782

TU. 4367

MA. 2914

[illegible]

near Calaway stone  
Inlmsgr  
Road

get ins<sup>ter</sup>  
J. A. Feltand

houses for -  
1200 lbs -  
eats

released  
R. O. Burgess

Jim Shins

AFFIDAVIT

STATE OF LOUISIANA

PARISH OF ORLEANS

BEFORE ME, the undersigned authority personally  
came and appeared,

plaintiff in these proceedings, who, after being duly sworn  
deposed and stated that  
defendant herein, is not in the military services of the United  
States of America nor in that of any of its allies.

Deponent further stated that the itemized statement  
of account annexed to and made part of the petition filed  
herein is true and correct and the amount shown thereon is  
due and unpaid.

GEORGIA BROILERS, INC.

350 CALLIOPE ST.

NEW ORLEANS 13, LA.

Signed

S. L. Hunt  
President

Sworn to and subscribed, before me,

this 30th day of Jan, 1961.

Jerome P. Halford  
NOTARY PUBLIC

JEROME P. HALFORD

Notary Public, Parish of Orleans, State of LA.  
My Commission is issued for life.



4387

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

GEORGIA BROILERS, INC., a  
Georgia corporation,

PLAINTIFF

VS:

J. A. FULFORD, d/b/a BUCK'S  
POULTRY,

DEFENDANT

FILED

FEB 6 1961

ALICE J. BUCK, Clerk

LAW OFFICE OF

FOREST A. CHRISTIAN  
FOLEY, ALABAMA

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

Received 6 day of Feb 1961  
J. A. Fulford  
BY SERVICES BY  
TAYLOR WILKINS Sheriff  
Baldwin County, Alabama

Sheriff claims 100 miles at  
Ten Cents per mile Total \$ 10.00  
TAYLOR WILKINS, Sheriff  
BY DEPUTY SHERIFF

GEORGIA BROILERS, INC. a )  
GEORGIA CORPORATION, )  
Plaintiff )

Vs. )

J. A. FULFORD, d/b/a )  
BUCK'S POULTRY )

Defendant )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4587.

Comes the defendant in the above styled cause and demurs to the complaint, and separately and severally to each count thereof, and for grounds of demurrer, assigns, separately and severally the following:

One.

It is not alleged with sufficient certainty for what the account was incurred.

Two


There was not attached to the copy of the complaint served on the defendant any itemized statement of account as alleged in the complaint and the defendant is not therefore apprised of the nature of the account.

Three

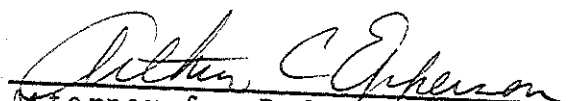
From aught that appears from the complaint the defendant made an entire purchase for the amount of the claim on the ~~xxxx~~ alleged date and was not therefore a continuing account.

Four

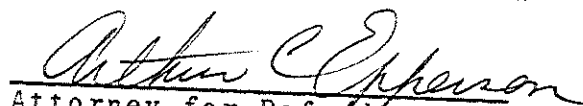
Said counts are vague and indefinite and uncertain..

  
Attorney for the Defendant

The Defendant demands  
a trial by Jury.

  
Attorney for Defendant

Copy mailed to  
Hon. Forest A. Christain  
Foley, Ala.  
This 6th day of April, 1961

  
Attorney for Defendant

Case No. 4587

In the Circuit Court of

Baldwin County, Alabama

At Law

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GEORGIA BROILERS INC.

PLAINTIFF

VS.

J. A. FULFORD

Defendant

888888888888888888888888888888

Demurrers

\*\*\*\*\*

FILED

APR 7 1961

ALICE J. DUCK, CLERK  
REGISTER

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALABAMA