

A. M. Bright Grocery Co.,  
a Corporation, Plaintiff.

CIRCUIT COURT BALDWIN  
COUNTY, ALABAMA.

vs

J. P. Lowell,

Defendant.)

Comes the defendant and for answer to the complaint denies the allegations contained in each and every count thereof.

PAGE & MOORE R.  
Defendants Attorneys.

LAW OFFICE OF  
**G. H. KRUEMPEL**  
ATTORNEY-AT-LAW  
Rechtsanwalt und Notar  
ADVOCaat EN PROCUREUR  
SOLICITOR IN CHANCERY  
PROCTOR IN ADMIRALTY  
MOBILE, ALA.

NOTARY PUBLIC IN OFFICE

October 22nd. 1918

Hon. Clerk of the Circuit Court  
Bay Minette, Ala.

Dear Sir:- In the matter of the A. M. Bright Grocery Co. Inc. vs John P. Lowell, now pending in Your Honorable Court, I should be pleased, if you will kindly send me the Costs Bill, because the Defendant is now ready to settle this Case. Thanking you for your promptness, I am

Very truly yours,

*G. H. Kruempel*  
Attorney for Plaintiff.

**G. H. KRUEMPEL**

ATTORNEY-AT-LAW

Rechtsanwalt und Notar

ADVOCAT EN PROCUREUR

SOLICITOR IN CHAMBERS

PROCTOR IN ADMIRALTY

MOBILE, ALA..

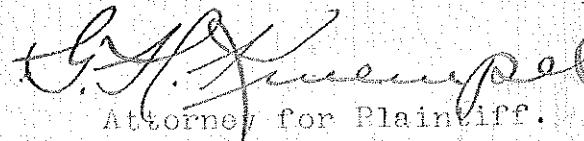
November 12th, 1918

Hon. T. W. Richerson,  
Clerk, Circuit Court  
Bay Minette, Ala.

Dear Sir:- Please find enclosed check for \$5.00 payment of costs in full, in the matter of "A. M. Bright Grocery Co. Inc vs John P. Lowell as per Bill, and hope, you will cause the Judge to dismiss this case.

Thanking you for your kindness, I am

Very truly yours,

  
G. H. Kruempel

Attorney for Plaintiff.

Mobile, Ala.,

J. P. Lowell  
Fairhope, Ala

To A. M. Bright Grocery Co., Inc. Dr.

Wholesale and Retail Grocers

N. W. Corner Government and St. Emanuel Streets

July 31/16 Balance due for Groceries 61 48  
"Credit"  
May 2/17 By Cash 5.00  
Balance 56 48

STATE OF ALABAMA,  
Mobile County.

Before me, G. H. Kruempel, a Notary Public, in and for said County and State,  
personally appeared A. M. Bright who, being by  
me duly sworn, deposes and says, that he knows from his own personal knowledge  
that the above account is true and correct, and that the amount thereof, to-wit:

The sum of Fiftysix 48/100 Dollars is still due from

J. P. Lowell and is unpaid.

Sworn to and subscribed before me, this 26 day of March 1918

G. H. Kruempel  
Notary Public, Mobile County, Ala.

We will not be responsible for any monies, unless paid at our store or to our  
Authorized Collector.

Bright.  
A. M. BRIGHT GROCERY COMPANY.  
a Corporation, - - - - - Plaintiff,  
vs  
J. P. LOWELL, - - - - - Defendant.

# # #  
Circuit Court of Baldwin County  
ALABAMA.

## CAUSE OF ACTION:

Plaintiff claims of the Defendant the sum of Fiftysix 48/100 (\$56.48)  
Dollars due by account, on to-wit: May 2nd. 1917

Plaintiff further claims of the Defendant the sum of Fiftysix 48/100  
(\$56.48) Dollars, due by account stated, between the Plaintiff and the  
Defendant on to-wit: The 2nd day of May, 1917

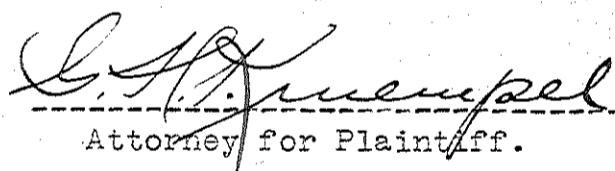
Plaintiff further claims of the Defendant the sum of Fiftysix 48/100  
(\$56.48) Dollars due by account verified by affidavit.

Plaintiff further claims of the Defendant the sum of Fiftysix 48/100  
(\$56.48) Dollars due for goods, ware and merchandise by the Plaintiff sold  
and delivered to the Defendant at his request, on to-wit: The 31st day of  
July, 1916 and prior thereto.

All of which sums, together with Interest thereon, since the 31st. day of  
July, 1916, are still due and unpaid, wherefore Plaintiff sues.

The account sued on is verified by affidavit.

G. H. KRUEMPEL,  
Attorney for Plaintiff.

  
\_\_\_\_\_  
G. H. Kruempel  
Attorney for Plaintiff.

## Notice to the Sheriff:

This Defendant is to be found at Fairhope, in Baldwin County.

SUMMONS AND COMPLAINT.

The State of Alabama  
Baldwin County

No.....

Circuit Court

Spring.....Term, 1918....

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon.....J.P. Lowell.....

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, State of Alabama, at Bay Minette, against.....him.....

.....the Defendant..... by..... A.M. Bright Grocery Company, a Corporation.....

Plaintiff

Witness my hand this..... 27th day of..... March..... 1918.....

T.W. Reeser.....

Clerk.

Complaint

..... Plaintiff Versus .....

The plaintiff claims of the defendant

Dollars due by

Plaintiff's Attorney.

*Original*

State of Alabama  
Baldwin County  
CIRCUIT COURT

A.M.Bright Gro Co.,

vs.

Plaintiffs

J.P. Lowell,

Defendants

Summons and Complaint

Filed March 27th 1918

*T.W. Ricemire* Clerk

Defendant lives at

Fairhope, Ala.

G.H.Kruempel Plaintiff's Attorney

Defendant's Attorney

Times Print—Bay Minette.

Received in office

March 27th 1918

Sheriff

I have executed this Writ

this *17 day April 1918*  
by leaving a copy of the within summons and com-  
plaint with

*John P. Lowell*

*C.E. Entwistle* Sheriff.

*A.T. Bassett* Deputy Sheriff.

A. M. Bright Grocery Co., )  
a Corporation, Plaintiff. )  
vs  
J. P. Lowell, )  
Defendant. )

CIRCUIT COURT BALDWIN  
COUNTY, ALABAMA.

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plaint denies the allegations contained in each and every  
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