

W. J. NELSON,

Plaintiff,

VS

EDWARD JOHNSON,

Defendant.

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

C O M P L A I N T

COUNT I

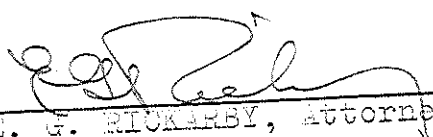
The Plaintiff claims of the Defendant the sum of FOUR HUNDRED EIGHTY-FOUR and 37/100 (\$484.37) Dollars due from him by account on, to-wit, the 18th day of April, 1959; which sum of money with the interest thereon is still unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED EIGHTY-FOUR and 37/100 (\$484.37) Dollars due from him for merchandise sold by the Plaintiff to the Defendant between the 24th day of March, 1958, and the 2nd day of May, 1958; which sum of money with the interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED EIGHTY-FOUR and 37/100 (\$484.37) Dollars due from him on accounts stated on, to-wit, the 18th day of April, 1959; which sum of money with the interest thereon is still unpaid.


E. G. RICKARBY, Attorney for
Plaintiff

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


E. G. RICKARBY, Attorney for
Plaintiff

March 1, 1961

Mr. Edward Johnson
Fairhope, Alabama

Account with W. J. NELSON

For V. C. Fertilizer purchased on the following dates:

3/24/58	8½ ton 4107	@	\$36.25	\$308.12
4/6/58	6 ton 4107	@	\$36.25	217.50
5/2/58	2½ ton Soda	@	\$60.00	150.00
5/2/58	3 ton 4107	@	\$36.25	108.75
				<u>\$784.37</u>
	Paid on account	4/18/59		300.00
	Balance			<u>\$484.37</u>

W. J. Nelson

STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, the undersigned notary public, personally appeared W. J. NELSON, who, being first duly sworn, deposes and says that he is the owner of the attached account and that the attached account is correct statement of account between W. J. NELSON and EDWARD JOHNSON and that there is owing from the said EDWARD JOHNSON the sum of FOUR HUNDRED EIGHTY-FOUR and 37/100 (\$484.37) Dollars, with interest from the 18th day of April, 1959.

W. J. Nelson

W. J. NELSON

Subscribed and sworn to before me on this the 11 day of March, 1961.

[Signature]

Notary Public, Baldwin County, Alabama.

FILED

MAR 13 1961

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon EDWARD JOHNSON

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 _____

EDWARD JOHNSON

by _____, Defendant

W. J. NELSON

Plaintiff.....

Witness my hand this 12 day of March 1961

Alice J. Duck Clerk

No. 4629 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

W. J. NELSON

Plaintiffs

vs.

EDWARD JOHNSON

Defendants

SUMMONS and COMPLAINT

Filed MAR 13 1961, 19.....

ALICE J. DUCK, CLERK
REGISTER, Clerk

E. G. Rickarby
Attorney at Law
P. O. Box 71
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Greeno Road
Fairhope, Alabama

RECEIVED IN OFFICE

March 15, 1961

Taylor Wilkins, Sheriff

I have executed this summons

this March 13, 1961

by leaving a copy with

Edward Johnson

Sheriff claims 60 miles at

Ten Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff

BY Childress
DEPUTY SHERIFF

Edward Johnson Sheriff
Childress Deputy Sheriff

Sumner

LAW OFFICES
E. G. RICKARBY
392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

March 6, 1961

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

Dear Mrs. Duck:

Inre: W. J. Nelson
vs: Edward Johnson
Our File: 5300

Enclosed find Summons and Complaint in the above mentioned cause, together with itemized and verified statement of account, in duplicate, and deposit for costs in the of \$25.00.

Please process and oblige.

Yours very truly,



WR
Encs:
cc: Mr. W. J. Nelson

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

April 14, 1961

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

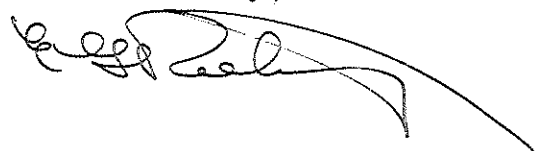
Dear Mrs. Duck:

Inre: W. J. Nelson
Vs: Ed Johnson

Please dismiss this case, #4629, of Nelson vs. Johnson.

Please, also, send back to me the \$3.00 refund of costs in this case. Thanks.

Yours very truly,



EGR/ts

ccs: Mr. W. J. Nelson
Mr. Ed. Johnson