

COMPLAINT

FOLEY BUILDING SUPPLY COMPANY

PLAINTIFF

VS

JOHN BOSWELL

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

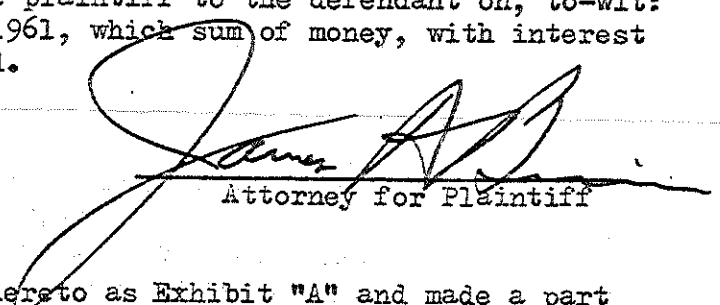
5164

I

The plaintiff claims of the defendant the sum of Five Hundred Three and 33/100 (\$503.33) Dollars, due from him on account, to-wit: the 16th day of April, 1961, which sum of money, with interest thereon, is still unpaid.

II

The plaintiff claims of the defendant Five Hundred Three and 33/100 (\$503.33) Dollars, due from him for merchandise, goods, and chattels sold by the plaintiff to the defendant on, to-wit: the 16th day of April, 1961, which sum of money, with interest thereon, is still unpaid.

  
Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof an itemized statement of account verified by W.M. Patterson, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 16th day of April, 1961, and due at present.

The defendant resides at 115 Truett Drive  
Montgomery, Alabama

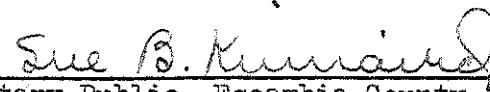
AFFIDAVIT

STATE OF ALABAMA     )  
COUNTY OF ESCAMBIA    )

                    Sue B. Kinnaird  
Before me, ~~Sara B. Greenawald~~, a Notary Public in and for  
said County and State, personally appeared W.M. Patterson, who  
being by me first duly sworn, deposes and says: that he is the  
owner of Foley Building Supply Company; that the annexed statement  
of account of the said Foley Building supply Company against  
John Boswell is just, true and correct; that there is now due  
on said account Five Hundred Three and 33/100 (\$503.33) Dollars  
after deducting all credits, set-offs or counterclaims.

  
\_\_\_\_\_  
W. M. Patterson

Sworn to and subscribed before me on  
this the 8<sup>th</sup> day of May, 1962.  
Witness my hand and official seal.

  
\_\_\_\_\_  
Notary Public, Escambia County, Alabama  
My commission expires 2-3-64



SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. ....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon John B. Boswell

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 .....

John B. Boswell ....., Defendant.....

by Foley Building Supply Company .....

....., Plaintiff.....

Witness my hand this 4 day of June 1962

Ed-6-9-62 Deirdre J. Albrecht ....., Clerk

**STATE of ALABAMA**

Baldwin County

**CIRCUIT COURT**

Foley Building Supply Company

Plaintiffs

vs.

John Boswell

Defendants

**Summons and Complaint**

Filed

**FILED**

19

JUN 4 1962

Clerk

ALICE J. DUCK, CLERK  
REGISTER

Plaintiff's Attorney

Defendant's Attorney

1027

Defendant lives at  
115 TRUETT DRIVE

MONTGOMERY, ALA.

Received In Office

JUN 5 1962

M. S. BUTLER, Sheriff

Sheriff.

I have executed this summons

this 9<sup>th</sup> day 1962  
by leaving a copy with

John Boswell

M. S. Butler

Sheriff.

Don L. Hagan

Deputy Sheriff.

JAMES A. BRICE

ATTORNEY AT LAW  
FOLEY, ALABAMA

WHITEHALL 3-3601

P.O. Box 298

May 30, 1962

Mrs. Alice J. Duck  
Circuit Clerk  
Bay Minette, Alabama

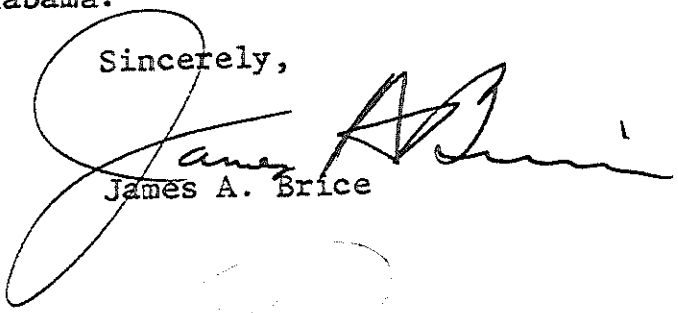
Re: Foley Building Supply Company  
Vs: John Boswell

Dear Mrs. Duck:

Summons and complaint in the above cause are herewith enclosed.

Defendant may be served with process at his residence,  
115 Truett Drive, Montgomery, Alabama.

Sincerely,

  
James A. Brice

JAB:j  
Enclosure as noted

# HELP WANTED

Vanity Fair Mills needs 2,000 women, ages 17-45 to register for employment in sewing and cutting work in new plant being considered for South Baldwin County. Personal interviews will be held Friday, June 15, 10 A.M. to 7 P.M. at City Halls in Fairhope, Foley, Loxley and Robertsedale.

It is up to every eligible female citizen to do their part to prove South Baldwin is ready for industry by appearing for interview or by encouraging her neighbor to do so. Those who registered May 25 do not need to register again. Remember to get this plant in South Baldwin 2,000 women must register for employment. If you desire more information contact the Mayor in any town in South Baldwin.

CARSON'S, FOLEY