

COMPLAINT

FOLEY BUILDING SUPPLY COMPANY

PLAINTIFF

VS

JOE SHOOTS

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

5-25-6

I

The plaintiff claims of the defendant the sum of One Hundred Forty Two and 25/100 (\$142.25) Dollars, due from him on account, to-wit: the 9th day of September, 1960, which sum of money, with interest thereon, is still unpaid.

II

The plaintiff claims of the defendant One Hundred Forty Two and 25/100 (\$142.25) Dollars, due from him for merchandise, goods, and chattels sold by the plaintiff to the defendant on, to-wit: the 9th day of September, 1960, which sum of money, with interest thereon, is still unpaid.

James A. Brum
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 9th day of September, 1960, and due at present.

The Defendant lives in (Aaronville) Foley, Alabama

FILED

AUG 28 1962

ALICE J. DUCK, CLERK
REGISTER

Page 1 (Duplicate)

STATEMENT

Foley Building Supply Co.

W. M. PATTERSON, OWNER
FOLEY, ALABAMA

W. O. HARPER, MGR.
PHONE WH 3-3411

ALL ACCOUNTS DUE FIRST OF MONTH

INTEREST CHARGED ON OVERDUE ACCOUNTS

Joe Shoats
Foley, Ala.

DATE	REFERENCE	CHARGES	CREDITS	BALANCE
			BALANCE FORWARD →	
4/11/60	16630	22.43		
4/11/60	16634	7.73		
4/17/60	16637	21.10		
4/14/60	16928	2.89		
4/16/60	(6579) CS		10.00	
4/22/60	17201	4.01		
4/23/60	17232	18.96		
4/23/60	17226	16.28		
4/23/60	17220	6.13		
4/25/60	(6553) CS		4.01	
4/28/60	17260	2.02		
4/29/60	17167	154.75		
4/29/60	17283	7.73		
4/29/60	17175	8.45		
5/1/60	17190	27.61		
5/1/60	17297 (Ret)		2.76	
5/16/60	18822	325.95		
5/18/60	18865	2.74		
5/23/60	18997	93		
5/23/60	18911	291.30		
5/26/60	19031	4.54		
				Bal 908.78

RT—RETURN
CM—CREDIT MEMO

DC—DISCOUNT
CS—CASH

(Contd)

PAY LAST AMOUNT
IN THIS COLUMN



AFFIDAVIT

STATE OF ALABAMA)
BALDWIN COUNTY)

Before me, Sue B. Kinnaird, 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 Joe Shoots of Foley, Alabama, is just, true and correct; that there is now due on said account One Hundred Forty Two and 25/100 (\$142.25) Dollars after deducting all credits, set/offs or counterclaims.

W. M. Patterson
W. M. Patterson

Sworn and subscribed before me on this the 15th day of August, 1962.

Sue B. Kinnaird
Notary Public, State of Ala. at large
My commission expires 2-3-64

Received 28 day of Aug 1962
and on _____ day of _____ 19____
I served a copy of the within etc
on Joe Shoots
By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

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 Joe Shoots

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 -----

Joe Shoots

-----, Defendant-----

by -----

Foley Building Supply

-----, Plaintiff-----

Witness my hand this 28 day of August 1962

E. J. - 9-8-62

Alice J. Clark, Clerk

STATE of ALABAMA**Baldwin County****CIRCUIT COURT**Foley Building Supply

Plaintiffs

vs.

Joe Shoots

Defendants

Summons and Complaint**FILED**

Filed _____ 19____

AUG 28 1962

AUG 1. 1962, CLERK
ALICE J. DUCK, REGISTERJ. A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Aaronville-Foley, Alabama**Received In Office**

_____, 19____

Sheriff.

I have executed this summons

this _____ 19____

by leaving a copy with

Joe Shoots

Sheriff claims _____

miles at _____

Ten Cents per mile Total \$ _____

TAYLOR WILKINS, Sheriff

BY _____

DEPUTY SHERIFF

Sheriff.

Deputy Sheriff.

R. R. Ralu

STATE of ALABAMA**Baldwin County****CIRCUIT COURT**

Foley Building Supply

Plaintiffs

vs.

Joe Shoots

Defendants

Summons and Complaint**FILED**

Filed 19

AUG 28 1962

ALICE J. BUCK, CLERK
ALICE J. BUCK, REGISTER

Clerk

J. A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Aaronville-Foley, Alabama

Received In Office

, 19

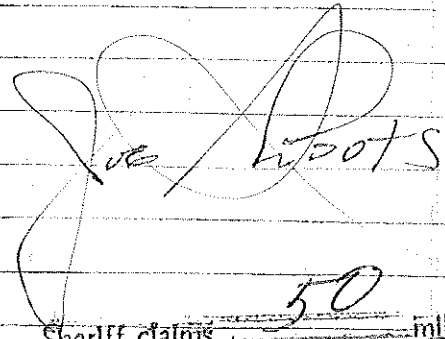
Sheriff.

I have executed this summons

this

19

by leaving a copy with



Sheriff claims

miles at

Ten Cents per mile Total \$

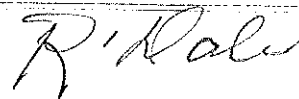
TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Sheriff.

Deputy Sheriff.



MESSAGE DATE

REPLY DATE:

Estate of W. M. Patterson
& Mrs. John McKenzie
108 Alexandra Drive
Atmore, Alabama

October 14, 1974

RE: Circuit Court No. 5256

Joe Shoots

Dear Mrs. McKenzie:

Please pay the enclosed costs
directly to Eunice B. Blackmon, Clerk
and notify my office when this has
been done.

Thank you.

Sincerely,

James A. Brice

James A. Brice

SENT BY

JAB:mm

10-14-74

We don't know anything about this.

"Mr. Patterson's estate was settled and
closed some time ago."

Mrs. W.M. Patterson

ANSWERED BY



STATEMENT

LAW OFFICE OF
JAMES A. BRICE

August 22, 1962

FOLEY, ALABAMA

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

Enclosures: Foley Building Supply

v
Joe Shoots

Foley Building Supply

v
H. E. Andress, individually,
and d/b/a Wee Bite Cafe