

COMPLAINT

FOLEY BUILDING SUPPLY COMPANY

PLAINTIFF

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

VS

H. E. ANDRESS, individually,  
also d/b/a WEE BITE CAFE

DEFENDANT

I

The plaintiff claims of the defendant the sum of One Hundred Fifteen and 99/100 (\$115.99) Dollars, due from him on account, to-wit: on September 19, 1960, which sum of money, with interest thereon, is still unpaid.

II

The plaintiff claims of the defendant One Hundred Fifteen and 99/100 (\$115.99) Dollars, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: September 19, 1960, which sum of money, with interest thereon is still unpaid.

*James A. Burt*  
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 19th day of September, 1960, and due at present.

The defendant resides at Foley, Alabama

FILED

AUG 28 1962

ALICE J. DUCK, CLERK  
REGISTER

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 H.E. Andress, individually, and also d/b/a Wee Bite Cafe, of Foley, Alabama, is just, true and correct; that there is now due on said account One Hundred Fifteen and 99/100 (\$115.99) 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.  
Witness my hand and official seal.

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

Received 28 day of Aug - 1962  
and on 22 day of Oct 1962  
I served a copy of the within etc  
on No. 8. Andress  
BY Service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Charles Wilkins D. S.  
Foley

Sheriff claims 12 miles at  
Ten Cents per mile Total \$ 1.238  
TAYLOR WILKINS, Sheriff  
BY CC  
DEPUTY SHERIFF

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Duplicate

STATEMENT

## Foley Building Supply Co.

W. M. PATTERSON, OWNER  
FOLEY, ALABAMAW. O. HARPER, MGR.  
PHONE WH 3-3411

ALL ACCOUNTS DUE FIRST OF MONTH

INTEREST CHARGED ON OVERDUE ACCOUNTS

N. E. Andrews

Foley, Ala.

| DATE     | REFERENCE | CHARGES          | CREDITS           | BALANCE |
|----------|-----------|------------------|-------------------|---------|
|          |           |                  | BALANCE FORWARD → |         |
| 9/30/59  | 12044     | 49.70            |                   |         |
| 9/30/59  | 12049     | 52.53            |                   |         |
| 10/1/59  | 12073     | 3.04             |                   |         |
| 10/1/59  | 12084     | 2.78             |                   |         |
| 10/2/59  | 11964     | 48.88            |                   |         |
| 10/2/59  | 12119     | 84.22            |                   |         |
| 10/3/59  | 12127     | 3.25             |                   |         |
| 10/5/59  | 12149     | 123.48           |                   |         |
| 10/5/59  | 11979     | 4.75             |                   |         |
| 10/5/59  | (12102)   |                  | 34.03             |         |
| 10/6/59  | 12172     | 17.06            |                   |         |
| 10/17/59 | 12315     | 9.27             |                   |         |
| 10/13/59 | 12344     | 7.42             |                   |         |
| 10/13/59 | 12353     | 17.20            |                   |         |
| 10/13/59 | (12343)   |                  | 11.79             |         |
| 10/14/59 | (12363)   |                  | 3.45              |         |
| 10/16/59 | 12019     | 583              |                   |         |
| 11/19/59 | (13315)   | <del>12.50</del> | 12.50             |         |
| 1/9/60   | (5967)    |                  | 100.00            |         |
| 3/3/60   | (6235)    |                  | 100.00            |         |
| 3/30/60  | 16473     | .21              | 21.63             |         |
| 3/3/60   | (16472)   |                  |                   |         |

Bal 141<sup>22</sup>

RT—RETURN

DC—DISCOUNT

CM—CREDIT MEMO

CS—CASH

(Contd)

PAY LAST AMOUNT  
IN THIS COLUMN

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Duplicate

STATEMENT

## Foley Building Supply Co.

W. M. PATTERSON, OWNER  
FOLEY, ALABAMAW. O. HARPER, MGR.  
PHONE WH 3-3411

ALL ACCOUNTS DUE FIRST OF MONTH

INTEREST CHARGED ON OVERDUE ACCOUNTS

H. E. Andrews (cont)

| DATE    | REFERENCE | CHARGES | CREDITS           | BALANCE   |
|---------|-----------|---------|-------------------|-----------|
|         |           |         | BALANCE FORWARD → | 141.22    |
| 4/29/60 | 17186     | 8.02    |                   |           |
| 6/24/60 | (6872)    |         | 100.00            |           |
| 7/1/60  | 18328     | 4.33    |                   |           |
| 7/2/60  | 18474     | 19.64   |                   |           |
| 7/5/60  | 18389     | 7.03    |                   |           |
| 7/12/60 | 18097     | 77      |                   |           |
| 7/12/60 | 18540     | 2.42    |                   |           |
| 8/2/60  | 12064     | 13.51   |                   |           |
| 8/6/60  | 112       | 26.58   |                   |           |
| 8/6/60  | 124       | 3.46    |                   |           |
| 9/19/60 | (7344)    |         | 100.00            |           |
|         |           |         |                   | Bal 26.98 |

RT—RETURN

DC—DISCOUNT

PAY LAST AMOUNT  
IN THIS COLUMN

CM—CREDIT MEMO

CS—CASH



Duplicate

## Foley Building Supply Co.

W. M. PATTERSON, OWNER

W. O. HARPER, MGR.

FOLEY, ALABAMA

PHONE WH 3-3411

ALL ACCOUNTS DUE FIRST OF MONTH

INTEREST CHARGED ON OVERDUE ACCOUNTS

H. E. Address

7 Wee Bite Cafe

| DATE    | REFERENCE | CHARGES | CREDITS           | BALANCE   |
|---------|-----------|---------|-------------------|-----------|
|         |           |         | BALANCE FORWARD → |           |
| 8/8/60  | 155       | 25.34   |                   |           |
| 8/9/60  | 180       | 20.93   |                   |           |
| 8/10/60 | 227       | 6.04    |                   |           |
| 8/10/60 | 358       | 21.35   |                   |           |
| 8/11/60 | 373       | 2.10    |                   |           |
| 8/13/60 | 427       | 11.81   |                   |           |
| 8/16/60 | 484       | 1.44    |                   |           |
|         |           |         |                   | Bal 89.01 |

RT—RETURN

DC—DISCOUNT

CM—CREDIT MEMO

CS—CASH

PAY LAST AMOUNT  
IN THIS COLUMN

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

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 H.E.Andress, ind-  
ividually and d/b/ a Wee Bite Cafe....., Defendant.....

by Foley Building Supply Company

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

Witness my hand this 25 day of August 1962

Exp-10-22-62 Alice J. Duck....., Clerk

No. 5252

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**STATE of ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

Foley Building Supply Com-  
pany

Plaintiffs

vs.

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

Defendants

**Summons and Complaint**

Filed

**FILED**

19

**AUG 28 1962**

Clerk

**ALICE J. DUCK, CLERK  
REGISTER**

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley, Alabama

Received In Office

, 19

Sheriff.

I have executed this summons

this

by leaving a copy with

H.E. Andress

Stephen Williams  
Deputy Sheriff  
Deputy Sheriff