

COMPLAINT

FOLEY BUILDING SUPPLY COMPANY)

PLAINTIFF)

VS)

KENNETH BELANGER DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5319

I

The plaintiff claims of the defendant the sum of Three Hundred Forty Eight and 38/100(\$348.38) Dollars, due from him on account, to-wit: the 30th day of May, 1962, which sum of money, with interest thereon, is still unpaid.

II

The plaintiff claims of the defendant Three Hundred Forty Eight and 38/100(\$348.38) Dollars, due from him for merchandise, goods, and chattels sold by the plaintiff to the defendant on, to-wit: the 30th day of May, 1962, which sum of money with interest thereon, is still unpaid.

James A. [Signature]
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 30th day of May, 1962, and due at present.

Kenneth Belanger lives at Box 53, Elberta, Alabama

FILED

OCT 4 1962

MADE I. [Signature] CLERK
REGISTER

Received 4 day of Oct 1962

and on _____ day of _____ 19____

I served a copy of the within A & C

on Kenneth Belanger

By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

AFFIDAVIT

STATE OF ALABAMA)
BALDWIN COUNTY)

Before me, Virgie E. Johnson, 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 the said Foley Building Supply Company against Kenneth Belanger of Elberta, Alabama, is just, true and correct; that there is now due on said account Three Hundred Forty Eight and 38/100 (\$348.38) Dollars after deducting all credits, set/offs or counterclaims.

W. M. Patterson
W. M. Patterson

Sworn and subscribed before me on this the 3rd day of October, 1962.

Virgie E. Johnson
Notary Public, State of Ala. at large
My commission expires 2-8-64

86 #1

NAME Mr. Kenneth Belanger

POLEY BUILDING SUPPLY CO.

ADDRESS Box 53, Elberta, Ala.

POLEY, ALA.

(Old Address-Rt.1, Gulf Breeze, Florida)

DATE	REFERENCE	DEBIT	✓	CREDITS	✓	BALANCE
				BALANCE FORWARD		
6/18/60	17791	311.51				
6/25/60	18064	52.36				
6/28/60	18245	34.25				
7/2/60	18382	190.74				398.15
7/2/60	6908					
7/9/60	18533	55.06	cs	200.00		
7/20/60	11527	16.72				
7/23/60	11601	12.81				
7/23/60	11603					
7/26/60	11632	50.37	cs	30.17		
10/15/60	7519		cs	50.00		493.38
11/5/60	8609		cs	75.00		443.38
						368.38
5/30/62	(Report-cash on acct)			20.00		348.38 ✓

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 Kenneth Belanger

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 _____

Kenneth Belanger

_____, Defendant_____

by Foley Building Supply Company

_____, Plaintiff_____

Witness my hand this 4 day of OCT 1962

Ed-12-18-62

Alfred French, Clerk

No. 5312 Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Foley Building Supply

Company

Plaintiffs

vs.

Kenneth Belanger

Defendants

Summons and Complaint

FILED

Filed _____ 19____

OCT 4 1932

ALICE L. DICK

CLERK
REGISTER

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Elberta, Alabama

Received In Office

_____, 19____

Sheriff.

I have executed this summons

this 12 7 18 / 45 19____

by leaving a copy with

Kenneth Belanger

Sheriff claims 84 miles at

Ten Cents per mile Total \$ 8.40

TAYLOR WILKINS, Sheriff

BY _____

DEPUTY SHERIFF

James A. Brice
Sheriff.

W. H. Wilkins
Deputy Sheriff.

E. H. Wilkins

JAMES A. BRICE

ATTORNEY AT LAW
FOLEY, ALABAMA

P.O. Box 298

WHITEHALL 3-3601

January 30, 1963

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

Dear Mrs. Duck,

Re: Case at Law No. 5319
Foley Building Supply Company vs Kenneth Belanger

According to my records the plaintiff is entitled to judgment by default in the amount of \$328.38 plus cost of court. The defendant has paid \$20.00 since suit was filed.

Re: Case at Law No. 5415
Thomas Hospital vs Dave Turberville

According to my records the plaintiff is entitled to judgment by default in the amount of \$253.00 plus cost of court.

Case at Law No. 5369
Reynolds Brothers Lumber Company vs Henry Gruber, Jr.

According to my records the plaintiff is entitled to judgment by default in the amount of \$333.17 plus cost of court. The figure is arrived at as follows:

\$ 416.91	principal amount of note
110.00	attorney's fee
31.26	interest

558.17	
225.00	paid since suit was filed

\$ 333.17 - judgment requested.

Will you kindly place this file before Judge Hall and send me certificate of judgment in each case?

Sincerely,

James A. Brice

jab:mm