

COMPLAINT

FOLEY BUILDING SUPPLY COMPANY )  
Plaintiff )

VS

JACK THARPE )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 5387

I

The plaintiff claims of the defendant the sum of Three Hundred Seventy Three and 94/100(\$373.94)Dollars, due from him on account, to-wit: the 30th day of May, 1962, which sum of money, with interest thereon, is still unpaid.

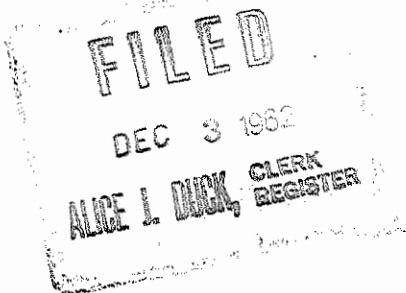
II

The plaintiff claims of the defendant Three Hundred Seventy Three and 94/100(\$373.94)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. Dineen*  
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.

Jack Tharpe lives at Rt. 1, Foley, Alabama



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 Jack Tharpe of Rt. 1, Foley, Alabama, is just, true and correct; that there is now due on said account Three Hundred Seventy Three and 94/100(\$373.94)Dollars after deducting all credits, set/offs or counterclaims.

W. M. Patterson  
W. M. Patterson

Sworn and subscribed before me on this the 16<sup>th</sup> day of November, 1962.

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

NAME Mr. Jack Thayer

ADDRESS Rt. 1, Foley, Ala.

DATE	REFERENCE	DEBIT	✓	CREDITS	✓	BALANCE
				BALANCE FORWARD		
1/1/60	17850	22.41		1 gal White Enamel & 238' Brown walling		
1/2/60	18259	1.19		1 roll vent. tape (250')		
1/3/60	18522	16.64		3 gal white satin & roller		
1/4/60	19351	31.52		6 Gals Wall Satin		
1/5/60	18575	5.25		1 gal wall coating		
1/15/60	18576	7.88		Imbr & Velt		
1/15/60	18175	3.15		Paint		
1/25/60	18176		ret	5.25		
1/28/60	18196	3.40		2 5# pipe vent. tape		
1/28/60	11737	49.77		Drain tile, mosaic, Cement etc.		
2/1/60	12025	6.95		1 pt Enamel & 45 drain tile		
2/2/60	11791	11.81		window stool & Mold.		
2/2/60	12041	5.57		45 drain tile		
2/2/60	12045	25.14		244 tear drop mold.		
2/2/60	12046		ret	4.62		
2/3/60	12063	1.18		38 1 pt Imbr & W. stool		
2/3/60	12057	10.51		Paint & Supl		
2/3/60	12058	.21		2 sand paper		
2/4/60	12080	2.52		1 Roll 30# Velt		
2/4/60	12092	4.17		3 1" Ys		
2/5/60	173	22.65		Paint & Brush		
2/22/60	219	8.21		80' tear drop Mold		
2/12/60	243	2.06		2 Molls Imbr.		
2/12/60	393	3.64		Paint		
2/12/60	242	2.25		1 Mu-Look & 1 Wipe On		
2/13/60	411		rec	5.80		
2/14/60	447	6.49		1 SL 320 & 1 SL 211		
2/16/60	271		ret	2.47		
2/18/60	573	110.62		Door Units, Door Stops & Mold.		
2/19/60	571	19.31		Locks		
2/23/60	621	34.83		Molding		
2/25/60	889	10.16		Casing, Nails etc.		
2/25/60	912	1.67		Imbr		
2/25/60	928	2.16		Imbr		
2/25/60	744	2.17		Molding		
2/31/60	1041	.67		Pt Enamel		
2/2/60	1081	1.43		1 Brush		
2/3/60	1100	1.70		1 Qt Varnish		
2/6/60	1120	2.68		Varnish		
2/12/60	1391	5.56		Bath Fixtures		
2/12/60	1206	5.04		Pipe, Faucett & Copper		
2/16/60	1192	1.96		2-plastic Cement		
2/22/60	1327	1.55		shower Curtain Rod		
3/10/60	2296	.44		44' Base Shoe		
3/10/60	2446	3.52		Plywood & Base Shoe		
3/12/60	2328	60.11		17 bags Ins.		
3/11/60	2684	5.86		1 12" Wrench		
3/11/60	2810	5.35		Plumbing Supl		
3/11/60	3062	1.33		Plumbing Supl		
3/11/60	3064	2.74		Plumbing Supl		
3/13/60	3451	5.41		Plumbing Supl		
3/13/60	3452	5.80		Plumbing Supl		
3/13/60	3453	5.80	ret	5.80		

NAME Mr. Jack Tharpe

ADDRESS Rt. 1, Foley, Ala.

REFERENCE	DEBIT	✓	CREDITS	✓	BALANCE
			BALANCE FORWARD	Bel. Fwd.	513.94
1/21/61 8008		Cr.	100.00		
2/2/61 8253		Cr.	10.00		
11/7/61 (Report)			5.00		
11/7/61 (Report)			10.00		
3/21/62 (Report)			10.00		
5/30/62 (Report)			10.00	Bel.	373.94

SUMMONS AND COMPLAINT

Moore Ptg. Co.

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 Jack Tharpe

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 \_\_\_\_\_

Jack Tharpe

\_\_\_\_\_, Defendant

by Foley Building Supply Company

\_\_\_\_\_, Plaintiff

Witness my hand this 3 day of Dec 1962

Ed-12-12-62

Wise of Newick, Clerk

HA King  
No. 5389

Page \_\_\_\_\_

The State of Alabama

Baldwin County

CIRCUIT COURT

Foley Building Supply Company

Plaintiffs

vs.

Jack Tharpe

Defendants

Summons and Complaint

Filed

FILED

19

DEC 3 1962

Clerk

ALICE J. DUCK, CLERK  
REGISTER

James M. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rt. 1, Foley, Alabama

Received In Office

12/3 1962

\_\_\_\_\_, Sheriff

I have executed this summons

this

Dec 12 1962

by leaving a copy with

James Tharpe

Shiff claims

72

miles at

Total \$ 7.20

FOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Sheriff

Deputy Sheriff

STATEMENT

LAW OFFICE OF  
JAMES A. BRICE

FOLEY, ALABAMA  
December 1, 1962

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

Enclosure: Summons and Complaint--Foley Building Supply  
vs  
Jack Tharpe

"A LAWYER'S TIME AND ADVICE ARE HIS STOCK IN TRADE"  
-A. LINCOLN