

COMPLAINT

FOLEY BUILDING SUPPLY COMPANY

PLAINTIFF

VS

RUFUS PHELPS

DEFENDANT

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

5413

I

The plaintiff claims of the defendant the sum of One Hundred Nineteen and no/100(\$119.00) Dollars, due from him on account, to-wit: the 16th day of July, 1960, which sum of money, with interest thereon, is still unpaid.

II

The plaintiff claims of the defendant One Hundred Nineteen and no/100 (\$119.00) Dollars, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: the 16th day of July, 1960, which sum of money, with interest thereon, is still unpaid.

*James A. B...*  
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 July, 1960, and due at present.

The defendant lives at Foley, Alabama.

FILED

DEC 18 1962

ALICE J. DUCK, CLERK  
REGISTER



AFFIDAVIT

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 Rufus Phelps, of Foley, Alabama, is just, true and correct; that there is now due on said account One Hundred Nineteen and no/100(\$119.00)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

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 Rufus Phelps

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 Rufus Phelps

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

by Foley Building Supply Company

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

Witness my hand this 18 day of Dec 1962

Exp-12-19-62

Oliver J. Smith, Clerk

No. 5413 Page \_\_\_\_\_

The State of Alabama

Baldwin County

CIRCUIT COURT

Foley Building Supply Company

Plaintiffs

vs.

Rufus Phelps

Defendants

Summons and Complaint

Filed FILED 19\_\_

DEC 18 1922 Clerk

ALICE J. DUCK, CLERK  
REGISTER

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley, Alabama

Received In Office

Dec. 18 1922

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

I have executed this summons

this Dec. 19 1922

by leaving a copy with

Rufus Phelps

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff

Charles C. Brice Deputy Sheriff

*[Signature]*