

attach 20 DS.

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA
P. O. DRAWER 190

January 28, 1963

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

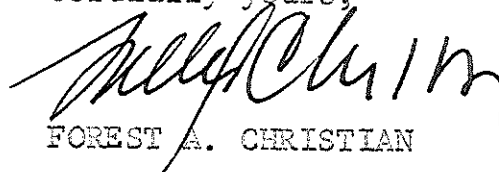
Case No. 5436
Re: J. W. Bain, Individually and d/b/a
J. W. Bain Construction Company
Vs: Theo Styron

Dear Mrs. Duck:

The case mentioned above was set for trial on Wednesday, February 13. However, Mr. Styron has brought me the papers today and he was not served until January 21 or 22, so the 30 days will not be up on it the day it is set for trial.

I intend to file pleadings for Mr. Styron so please put my name on the docket sheet for his attorney.

Cordially yours,


FOREST A. CHRISTIAN

JAMES A. BRICE

ATTORNEY AT LAW
FOLEY, ALABAMA

P.O. Box 298

WHITEHALL 3-3601

March 1, 1963

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

Dear Mrs. Duck,

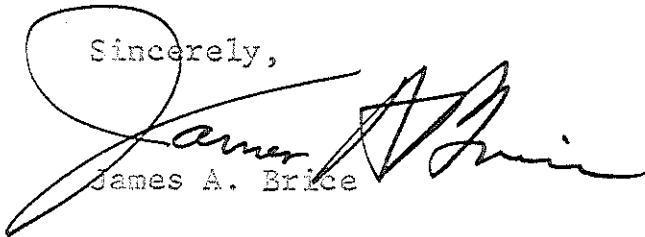
Re: J. W. Bain, individually and d/b/a)
J. W. Bain Construction Company) Case #5436
Vs: Theo Styron) At Law

According to my records the plaintiff is entitled to judgment by default in the amount of \$665.38. The figure is arrived at as follows:

\$ 656.04	principal amount of account
<u>9.34</u>	interest
665.38	

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

Sincerely,


James A. Brice

-jab:mm

*Dunn
Feb*

J. W. BAIN, individually and d/b/a
J. W. BAIN CONSTRUCTION COMPANY

PLAINTIFF

VS

THEO STYRON

DEFENDANT

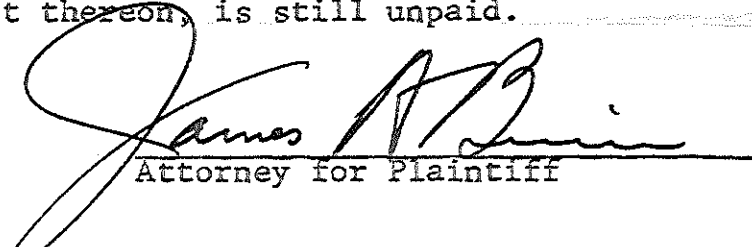
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

I

The Plaintiff claims of the Defendant Six Hundred Fifty-six and 04/100 (\$656.04) Dollars, due from on account, to-wit: the 5th day of November, 1962, which sum of money, with interest thereon, is still unpaid.

II

The Plaintiff claims of the Defendant Six Hundred Fifty-six and 04/100 (\$656.04) Dollars, due from him for services performed doing dragline work and earth moving done by the Plaintiff for the Defendant, on, to-wit: the 5th day of November 1962, which sum of money, with interest thereon, is still unpaid.


Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof, an itemized statement of account verified by affidavit of J. W. Bain, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 5th day of December 1962, and due at present.

ROBERTSDALE, ALA., November 5, 1962

J. W. Bain Construction Co.

CLEARING, DRAINAGE, AND EXCAVATION

M r. Theo Styron

Foley, Alabama

CONTACT
J. W. BAIN

DRAGLINES, DOZERS, PAN, AND DUMP TRUCKS

PHONE WI 7-2522
ROBERTSDALE, ALA.

		Dragline work				
Mar.	24	1960	2 hrs			
	25		4 $\frac{1}{2}$			
	27		7 $\frac{1}{2}$			
			<u>14 hrs</u>	@	12 50	175 00
March	1 thru 7, 1962	1978 yds	@ .18	per yd.		356 04
	30 & Apr. 5	10 hrs	@		12 50	<u>125 00</u>
				Total:		656 04

AFFIDAVIT

STATE OF ALABAMA)

BALDWIN COUNTY)

Before me, the undersigned, a Notary Public in and
for said County and State, personally appeared J. W. Bain
 , who being by me first duly sworn, deposes and says: that
he is the owner of J. W. Bain Construction Company;
that the annexed statement of account of the said J. W. Bain Con-
struction Company, against Theo Styron
 , is just, true and correct; that there is now due on said
account Six Hundred Fifty Six Dollars and 04/100----- after
deducting all credits, set/offs or counterclaims.

Sworn and subscribed before me on this the

5th day of December, 1962.

Virgie E. Johnson
Notary Public, Baldwin County, Alabama

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

Theo Styron

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 _____

Theo Styron _____, Defendant _____

by J. W. Bain, individually and d/b/a J. W. Bain Construction

Company _____, Plaintiff _____

Witness my hand this 17 day of June 1968

Ed-1-22-63

Alice J. Clark, Clerk

No. 5436

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

J.W.Bain, individually and
d/b/a J.W.Bain Construction
Company

Plaintiffs

vs.

Theo Styron

Defendants

Summons and Complaint

Filed

FILED

19

JAN 17 1963

ALICE T. DUCK, CLERK

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley, Alabama

Received In Office

Jan. 17, 1963

Sheriff.

I have executed this summons
this Jan 22 1963
by leaving a copy with

Theo Styron

Sheriff claims 84

Ten Cents per mile Total \$ 8.40

J. TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

J. Taylor Wilkins

Sheriff.

Phillip

Deputy Sheriff.

Wm. A. Brice

DEMURRER

J. W. BAIN, individually and d/b/a)
J. W. BAIN CONSTRUCTION COMPANY,)

PLAINTIFF)

VS.)

THEO STYRON,)

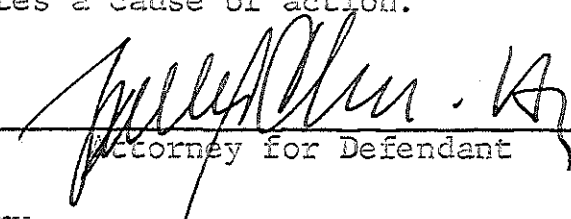
DEFENDANT)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Comes the defendant in the above styled cause and demurs
to all of the Plaintiff's counts, jointly and severally, for the
reason that neither count states a cause of action.


Attorney for Defendant

Defendant demands trial by jury.

FILED

FEB 20 1963

**ALICE J. DUCK, CLERK
REGISTER**

Amended Answer

J. W. BAIN, individually and d/b/a)
J. W. BAIN CONSTRUCTION COMPANY,)

PLAINTIFF)

VS:)

THEO STYRON,)

DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes the defendant and amends his answer to the plaintiff's
complaint and states:

1. That he is not indebted to plaintiff in the amounts claimed
or any other amount.

2. That the defendant has paid the plaintiff.


Attorney for defendant

Defendant demands trial by jury.

FILED

JUL 9 1983

ALICE J. DUCK, CLERK
REGISTER

Give the Jury find for the
Plaintiff in the amount of
\$406.04 interest included.

C. H. Bryan Jr

A N S W E R

J. W. BAIN, individually and d/b/a)
J. W. BAIN CONSTRUCTION COMPANY,)

PLAINTIFF)

VS.)

THEO STYRON,)

DEFENDANT.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

5436

Comes the defendant for answer to the Plaintiff's complaint and states that he is not indebted to Plaintiff in the amounts claimed or any other amount.



Attorney for Defendant

Defendant demands trial by jury.



FILED

JUN 26 1963

ALICE I. DUCK, CLERK
REGISTER

- ~~1. Koch, William, Ideal Cement cost Controller, Spanish Ft.~~
- ~~2. Cooper, John L., Laborer, Bay Minette~~
- ~~3. Cox, Y.A., Jr., Farmer, Stockton~~
- ~~4. Garrett, Malcolm, Farmer, Belforest~~
- ~~5. Gates, Carl B., Farmer, Robertsedale~~
- ~~6. Gee, Luther, State Employee, Bay Minette~~
- ~~7. Hall, John, Sr., Carpenter, Loxley~~
- ~~8. Hayles, J. Otis, Farmer, Perdido~~
- ~~9. Hedge, Langston, Chemist, Bay Minette~~
- ~~10. Helms, Kenneth B., Civil Service, Elberta~~
- ~~11. Hinterlighter, Daniel G., Clerk, Bay Minette~~
- ~~12. Hoffman, Winfred C., Gov't Emp., Bay Minette~~
- ~~13. Landcaster, Eartis, Paperwood, Robertsedale~~
- ~~14. Larson, Arthur, Farmer, Rosinton~~
- ~~15. Lipscomb, Frederick A., Farmer, Mag. Spgs.~~
- ~~16. Little, Bernie, Mechanic, Bay Minette~~
- ~~17. Long, Fred, Brookley Field, Fairhope~~
- ~~18. Lowery, Robert, Dairyman, Fairhope~~
- ~~19. Mascaro, Edward, Corp. Secretary, Spanish Fort,~~
- ~~20. Mason, Arnold K., Farmer, Mag. Spgs.~~
- ~~21. McKenzie, J.D., Farmer, Robertsedale~~
- ~~22. Page, Glenn A., Jr., Ins., Bay Minette~~
- ~~23. Urbanch, Robert C., Brookley Field, Fairhope~~
- ~~24. Weeks, Ellis, Laborer, Mag. Spgs.~~
- ~~25. Wilcox, Roy E., Trk. Driver, Elberta~~
- ~~26. Kaiser, Paul, Jr., Farmer, Gulf Shores~~
- ~~27. Allegri, Angelo, Carpenter, Fairhope~~
- ~~28. Armstrong, William, Civil Service, Elberta~~
- ~~29. Baker, Lewis E., Foley Fert. Co., Foley~~
- ~~30. Barnhill, Charles W., Oil Dealer, Robertsedale~~
- ~~31. Bell, Bill, Brookley Field, Rosinton~~
- ~~32. Blackwell, Earl, Merchant, Foley~~
- ~~33. Boeschen, Arthur, Farmer, Bay Minette~~
- ~~34. Boone, DeWitt, Ideal Cement Cost Controller, Spanish Ft.~~
- ~~35. Bryant, Roy Woolf, Farmer, Bay Minette~~
- ~~36. Bryars, Charles Henry, Jr., Farmer, Stockton~~
- ~~37. Buck, Eddie, Shipyard, Robertsedale~~
- ~~38. Chafin, J. Horace, Trk. Driver, Perdido~~
- ~~39. Chesnick, Joe, Farmer, Robertsedale~~
- ~~40. Childress, Kenneth, Barber, Foley~~
- ~~41. Childress, Rube, Farmer, Loxley~~
- ~~42. Cocke, James, Jeweler, Fairhope~~
- ~~43. Conway, James, Mobile Construction, Daphne~~
- ~~44. Lipscomb, Ira, Farmer, Mag. Spgs.~~
- ~~45. Inge, McKinley, Clerk, Bay Minette~~
- ~~46. Smith, Samuel, Sr., Brookley Field, Daphne~~
- ~~47. Stephens, W. Henry, Millman, Stockton~~
- ~~48. Styron, Theo, Farmer, Foley~~

P XXXXX XXX

D XXXXX XXXX

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