

REYNOLDS BROTHERS LUMBER COMPANY, INC., a corporation

PLAINTIFF

VS

CAL TAYLOR, individually and
d/b/a CAL TAYLOR CONSTRUCTION
COMPANY

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 5709

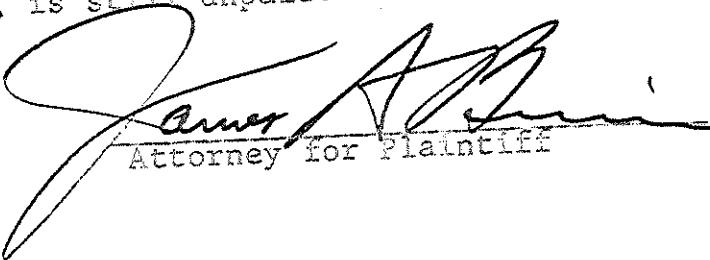
COMPLAINT

I

The Plaintiff claims of the Defendant One Thousand Three Hundred EightyOne and 37/100 Dollars (\$1,381.37), due from him on account, to-wit: the 2nd day of August 1963, which sum of money, with interest thereon, is still unpaid.

II

The Plaintiff claims of the Defendant One Thousand Three Hundred Eighty-One and 37/100 Dollars (\$1,381.37), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: the 2nd day of August 1963, which sum of money, with interest thereon, is still unpaid.


Attorney for Plaintiff

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 Cal Taylor, individually, and d/b/a Cal
Taylor Construction Company

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 Cal Taylor, individ-
ually, and d/b/a Cal Taylor Construction Company, Defendant.

by _____

Reynolds Brothers Lumber Company, Inc., a corporation, Plaintiff.

Witness my hand this 13 day of Sept 1963

EX-11-13-63

Ellie J. Luck, Clerk

No. 5709

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Reynolds Brothers Lumber Com-
pany, Inc. a corporation

Plaintiffs

vs.

Cal Taylor, individually, and
d/ba/ Cal Taylor Construction
Company

Defendants

Summons and Complaint

FILED

Filed SEP 18 1963 19__

WILL DICK CLERK
REG. 100

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robertsdale, Alabama

Received In Office

_____, 19__

Nov-13-1963 Sheriff.
I have executed this summons

this Sept 27 1963

by leaving a copy with

Cal Taylor

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Carlisle Sheriff.
Deputy Sheriff Deputy Sheriff.

Robertsdale - 50 mi

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5709

Now comes James A. Brice, attorney of record for Plaintiff in the above styled cause, and with leave had and obtained prior hereto, withdraws as attorney as record for the Plaintiff, this 16th day of September 1964.

James A. Brice, Attorney for Plaintiff

FILED

SEP 22 1964

CLERK
REGISTER

REYNOLDS BROTHERS LUMBER COMPANY,
INC., a corporation

PLAINTIFF

VS

CAL TAYLOR, individually and
d/b/a CAL TAYLOR CONSTRUCTION
COMPANY,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 5709

MOTION TO STRIKE

Now comes the Plaintiff, by its attorney, and moves to strike the Jury Demand heretofore filed in this cause by the Defendant, and as grounds therefore would show unto your Honor as follows:

1. That service was perfected on the Defendant on November 13, 1963. That demand for jury trial was made by the Defendant on December 31, 1963. That therefore the demand for trial by jury was not made within thrity days after the perfection of service on the Defendant.

WHEREFORE, Plaintiff moves to strike Defendant's Jury Demand.

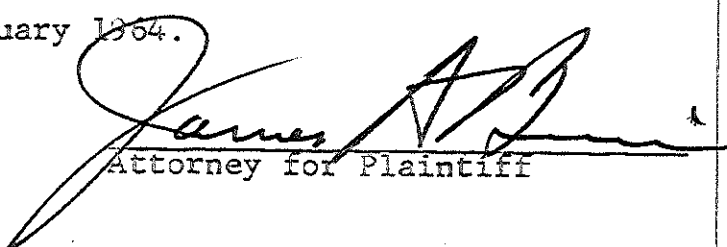

Attorney for Plaintiff

Sworn to and subscribed before me
this 30th day of January 1964.



Notary Public
Baldwin County, Alabama

As attorney for Plaintiff I hereby certify that I have this day mailed a copy of the foregoing Motion to Strike, postage prepaid, to Mr. John P. Beebe, Attorney for Defendant, Robertsedale, Alabama, this 30th day of January 1964.


Attorney for Plaintiff

FILED

JAN 31 1964

ALICE L. DUCK, CLERK
REGISTER

475

REYNOLDS BROTHERS LUMBER COMPANY,
INC., a corporation,

Plaintiff,

vs

CAL TAYLOR, individually and
d/b/a CAL TAYLOR CONSTRUCTION
COMPANY,

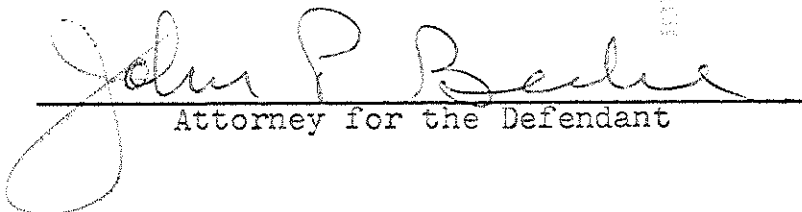
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW No. 5709

Comes the Defendant in the above entitled cause and for answer
to the complaint filed therein and to each and every count separately
and severally, saith that the allegations contained therein are untrue.


Attorney for the Defendant

THE DEFENDANT DEMANDS A TRIAL BY JURY

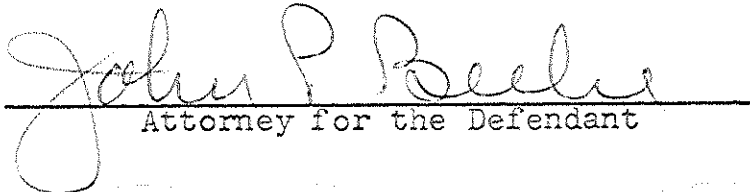
I, JOHN P. BEEBE, attorney for the Defendant, hereby certify
that I have this day served a copy of the foregoing answer of the Def-
endant, by mailing a copy thereof, postage prepaid, to Mr. James A.
Brice, Attorney for the Plaintiff, Foley, Alabama, by first class mail.

Dated this the 30th day of December, 1963.

FILED

DEC 31 1963

ALICE L. DUCK, CLERK
REGISTER


Attorney for the Defendant

REYNOLDS BROTHERS LUMBER COMPANY,
INC., a corporation,

vs

Plaintiff,

CAL TAYLOR, individually and
d/b/a CAL TAYLOR CONSTRUCTION
COMPANY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW No. 5709

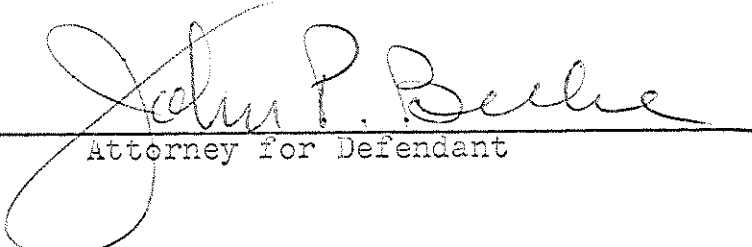
MOTION TO QUASH SUMMONS

Comes the Defendant in the above styled cause and moves
the Court to quash the summons served on the said Defendant in that
the same was executed by leaving a copy thereof with the Defendant
on Sunday, September 29th, 1963.

FILED

OCT 24 1963

MADE L. DUCK, CLERK
RECEIVED


Attorney for Defendant