

MATERIAL SALES COMPANY, INC.,
A Corporation,

Plaintiff,

-VS-

EUGENE L. CAVER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.

5891

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant the sum of
THREE HUNDRED FORTY-NINE AND 12/100 (\$349.12) DOLLARS for
materials and supplies furnished by the Plaintiff at the request
of the Defendant on a building or improvement on the following
described property, viz:

From the Northwest corner of Section 29, Town-
ship 6 South, Range 2 East, run Eastwardly
along the North Boundary of said Section, 704
feet; thence run South 04° 30' West, 20 feet
for a point of beginning: Thence run South 04°
30' West, 125.9 feet; thence run South 88° 46'
East, 153 feet, along the North boundary line
fence of Helen Porter's property; thence run
North 88° 09' East, 68 feet; thence run North
04° 30' East, 127 feet, to a point 20 feet
South of the North line of said Section;
thence run West and parallel to the said
Section line, 221 feet, to the point of beginning.
Lot is bounded West by a public lane or alley;
South by property of Fritz & Helen Porter and
Paul Houston; East by property of Angelo and
Juanita Houston; and North by the Twin Beach
Road; lot lies in the Northwest Quarter of the
Northwest Quarter of Section 29, Township 6 South,
Range 2 East, Baldwin County, Alabama. Contains
65/100 acres, more or less;

said indebtedness accrued between the 18th day of July, 1963,
and the 19th day of July, 1963, both inclusive, and is now due
and unpaid.

Plaintiff alleges that the above described property is
the property of the defendant, EUGENE L. CAVER; that said materi-
als and supplies were furnished Defendant for the improvements on
said land under and by virtue of a contract with the said EUGENE
L. CAVER, the owner or proprietor thereof; that within six months,
after the said indebtedness had matured, on, to-wit the 9th day
of December, 1963, Plaintiff did file in the office of the Judge
of Probate of the county wherein said land is situated, a verified

(Page One)

statement as required by law, a copy of which is attached hereto, made a part hereof, and marked Exhibit "A"; wherefore, Plaintiff claims a lien for said amount upon said land and buildings and improvements situated thereon.

The account sued on is evidenced by an itemized and verified statement filed herewith.

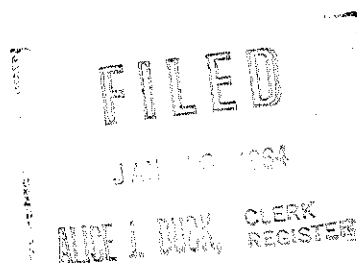
Count II.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY-TWO AND 80/100 (\$162.80) DOLLARS for merchandise, goods and chattels sold by FAIRHOPE HARDWARE & SUPPLY CO., INC., a corporation, to the Defendant between the 4th day of March, 1963 and the 18th day of June, 1963, at his request, which sum of money, with the interest thereon, is still unpaid, and is the property of the Plaintiff.

The account sued on is evidenced by an itemized and verified statement filed herewith.


E. G. RICKARBY, Attorney for
Plaintiff.

Defendant can be located on
Twin Beach Road, east of
Section Street on the right
side of Twin Beach Road, in
Fairhope, Alabama.



LAW OFFICES
E. G. RICKARBY
392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

January 15, 1964

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

Dear Mrs. Duck:

Inre: Material Sales Company, Inc.
Vs: Eugene L. Carver
Our File: 64-6

Enclosed find Summons and Complaint of Material
Sales vs. Carver. Please process and oblige.

Yours very truly,



EGR/ms
Enclosure
cc: Material Sales Co., Inc.

1-25-64

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532

March 14, 1964

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Please present these papers to Judge Hall and
get them signed and issue me a certificate of
judgment for \$532.36 which is Count I for lien of
\$349.12 plus \$13.96 interest; and, Count II on
open account of \$162.80 plus \$6.48 Interest.

Yours very truly,

EGR/ms
Enclosure
3-27-64

cc: Material Sales Company, Inc.

249.12
13.96
162.80
6.48
532.36

532.36

169.28

249.12
13.96
363.08

FAIRHOPE HARDWARE & SUPPLY CO., Inc.

337-339 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532

- Eugene L. Caver
- 729 Front Street
- Mobile, Alabama

PLEASE RETURN THIS STUB WITH YOUR CHECK. (1)

AMOUNT ENCLOSED \$.....

DATE	CHARGE		CREDIT	BALANCE
BALANCE FORWARDED				.00

3/4/63	41.49
3/5/63	24.46
3/7/63	2.47
3/7/63	37.60
3/8/63	12.36
3/8/63	19.28
3/9/63	11.13
3/9/63	1.60
3/12/63	56.28
3/14/63	2.37
3/15/63	91.22
3/15/63	3.56
3/19/63	17.61
3/20/63	8.14
3/20/63	3.61
3/21/63	10.97
3/21/63	11.74
3/23/63	10.46
3/27/63	131.32

3/5/63 4.64 C.M.

Continued

FAIRHOPE HARDWARE & SUPPLY CO., INC., FAIRHOPE, ALABAMA

PAY LAST AMOUNT IN THIS COLUMN

Must Show Charge on all accounts remaining due 30 days after date of billing.

FAIRHOPE HARDWARE & SUPPLY CO., Inc.

337-339 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532

• Eugene L. Caver
• 729 Front Street
• Mobile, Alabama

PLEASE RETURN THIS STUB WITH YOUR CHECK. (2)

AMOUNT ENCLOSED \$.....

DATE	CHARGE		CREDIT	BALANCE
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BALANCE FORWARDED 

3/29/63	5.36			
6/18/63	4.98			
		6/29/63	350.00	153.37
7/15/63	1.53			
8/14/63	1.55			
9/14/63	1.56			
10/11/63	1.58			
11/11/63	1.60			
12/14/63	1.61			
				162.80

FAIRHOPE HARDWARE & SUPPLY CO., INC., FAIRHOPE, ALABAMA

PAY LAST AMOUNT IN THIS COLUMN 

1 % Per Month Service Charge on all accounts remaining due 30 days after date of billing.

STATE OF ALABAMA)
COUNTY OF BALDWIN)

MATERIAL SALES COMPANY, INC. files this statement in writing, verified by the oath of ROBERT HIRSCHFELDT, who has personal knowledge of the facts herein set forth:

That said MATERIAL SALES COMPANY, INC. claims a lien upon the following property, situated in FAIRHOPE, ALABAMA, county, Alabama, to-wit:

From the Northwest corner of Section 29, Township 6 South, Range 2 East, run Eastwardly along the North Boundary of said Section, 704 feet; thence run South 04° 30' West, 20 feet for a point of beginning: Thence run South 04° 30' West, 125.9 feet; thence run South 88° 46' East, 153 feet, along the North boundary line fence of Helen Porter's property; thence run North 88° 09' East, 68 feet; thence run North 04° 30' East, 127 feet, to a point 20 feet South of the North line of said Section; thence run West and parallel to the said Section line, 221 feet, to the point of beginning. Lot is bounded West by a public lane or alley; South by property of Fritz & Helen Porter and Paul Houston; East by property of Angelo and Juanita Houston; and North by the Twin Beach Road; lot lies in the Northwest Quarter of the Northwest Quarter of Section 29, Township 6 South, Range 2 East, Baldwin County, Alabama. Contains 65/100 acres, more or less.

This lien is claimed, separately and severally, as to both the buildings and improvements thereon, and said land.

That said lien is claimed to secure an indebtedness of \$ 347.51 (Threehundredfortyseven 51/100) with interest from this date, for

1 VM pump complete

Building material

The name of the owner or proprietor of said property is Eugene L. Caver

Robert Hirschfeldt
Material Sales Company, Inc.
Claimant

Before me Dorothy Allegri, a notary public in and for the county of Baldwin, State of Alabama, personally appeared Robert Hirschfeldt who being duly sworn, doth depose and say: That he has personal knowledge of the facts set forth in the foregoing statement of lien, and that the same are true and correct to the best of knowledge and belief.

Subscribed and sworn to before me on this the 7 day of December 1963 by said affiant.

Dorothy Allegri
Notary Public

DOROTHY ALLEGRI - NOTARY PUBLIC
BALDWIN COUNTY
MY COMMISSION EXPIRES AUGUST 28, 1967

FILED

JAN 26 1964

NOTARY PUBLIC

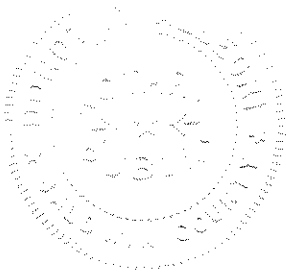
STATE OF ALABAMA
COUNTY OF BALDWIN

Before me, the undersigned Notary Public, personally appeared ROBERT HIRSCHFELDT, who being duly sworn, deposes and says that he is the credit manager of MATERIAL SALES CO., INC., a Corporation, the owner of the attached account and that the attached account is a correct statement of account between MATERIAL SALES COMPANY, INC., and EUGENE L. CAVER, and that there is owing from the said EUGENE L. CAVER, to the said MATERIAL SALES COMPANY, INC., the sum of THREE HUNDRED FORTY-NINE DOLLARS AND 12/100 (\$349.12), with the interest thereon.

Robert Hirschfeldt
AFFIANT

Subscribed and sworn to before me on this the 13 day of
January, 1964.

Dorothy Miller
Notary Public, Baldwin County, Alabama



DOROTHY MILLER
BALDWIN COUNTY
MY COMMISSION EXPIRES

FILED
JAN 16 1964
ALICE L. DUCK
CLERK
REGISTER

560 E. FAIRHOMER AVE
P. O. BOX 37
PHONE WA 8-9915

FAIRHOPE, ALABAMA

DATE 7-18-63
ACCOUNT NO. _____
PURCHASE ORDER NO. _____

copy

RECEIVED BY *E. L. Caver*

	163.80
SALES TAX	12.56
TOTAL CHARGES	176.36

SERVICE CHARGE OF 1% PER MONTH ADDED TO ALL PURCHASES WITH UNPAID BALANCE AFTER 30 DAYS FROM DATE OF BILLING.

SUMMONS AND COMPLAINT

Baldwin Times

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 EUGENE L. CAVER

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 EUGENE L. CAVER,

Defendant_____

by MATERIAL SALES COMPANY, INC., a corporation,

Plaintiff_____

Witness my hand this 16 day of June 1964

Alvin J. Duck Clerk

No. 5891

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

MATERIAL SALES COMPANY, INC.

A Corporation,

Plaintiffs

Turn left on Twin Beach Rd. S-6. Use
on Rt. "old Brick"
EUGENE L. CAVER,

Twin Beach Rd.

Defendants

SUMMONS and COMPLAINT

Filed

FILED

, 19

JAN 16 1964

, Clerk

E. G. RICKARBY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Twin Beach Road,
Fairhope, Alabama

RECEIVED IN OFFICE

Jan 16, 1964

Taylor Wilkins, Sheriff

I have executed this summons

this 13th of Feb, 1964

by leaving a copy with

Eugene L. Caver

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

Deputy Sheriff

Taylor Wilkins Sheriff

Fred Libert Deputy Sheriff

J. W. W.

STATEMENT

DIAL WA 8-9915

560 FAIRHOPE AVENUE

*Material Sales Co., Inc.*P. O. BOX 37
FAIRHOPE, ALABAMAEugene L. Caver729 Front StreetMobile, Alabama

PLEASE RETURN WITH REMITTANCE

BALANCE FORWARDED

.00

170.36

5.20

2.63^x2.67^x2.71^x2.75^x

162.80

349.12

MONTHLY SERVICE CHARGE ON ALL ACCOUNTS WITH BAL. OVER 30 DAYS FROM DATE OF BILLING