NSTRUCTIONS		pull out yellow sheet, mail the ot	
REC	IPIENT: Write your reply at botto	m, mail back white sheet and kee	p the pink.
T Clerk of	e J. Duck Circuit Court te, Alabama	O 319 Ma M FAIRHO	& RICHARD (eys At Law gnolia Avenue PE, ALABAMA
Thorpe's,	Inc., VS. Cal Taylor	February 12,1964	Message
	(NIST TYPE (OR WRIT	E) ON ORIGINAL. YOUR IMPRESSION Y APPEAR ON COPIES BENEATH.	Form 87 · New England Business
Dear Mrs. Enclosed have serv	is Summons and Complaint	on the above. Pleas	se file and
	Sinc	erely yours,	
RCL:W Encl.		SIGNED: Carl	2and C
	DATE OF R	EPLY: REPLY TO:	rd C. Lacey
	DATE OF R	EPLY: REPLY TO:	rd C. Lacey
	DATE OF R	EPLY: REPLY TO:	rd C. Lacey
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	DATE OF R	EPLY: REPLY TO:	rd C. Laces

Write (or type) message, pull out yellow sheet, mail the other two.

THORPE'S, INC.,
An Alabama Corporation,

Plaintiff

VS.

CAL TAYLOR, individually)
and d/b/a CAL TAYLOR CONSTRUCTION COMPANY; CAL TAY-)
LOR CONSTRUCTION COMPANY,
A Corporation

Defendant

)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

BILL OF COMPLAINT

I

The Plaintiff claims of the Defendant the sum of One Thousand Eight Hundred Thirty-Seven and 59/100 Dollars (\$1837.59), due from him on account, to-wit; the 31st day of January, 1964, which sum of money with the interest thereon, is still unpaid.

II

The Plaintiff claims of the Defendant One Thousand Eight Hundred Thirty-Seven and 59/100 Dollars (\$1837.59), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit; the 31st day of January, 1964, which sum of money with interest thereon is still unpaid.

DUCK AND LACEY, Attorneys for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof, an itemized statement of account verified by R. YOUNG THORPE, JR., a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 31st day of January, 1964, and due at present.

The Defendant resides at Robertsdale, Alabama.

FILED
FEB 13 1964

AUCE I MION, CLERK

THORPE'S

INC.

3300 OLD SHELL RD. AT THE BELTLINE MOBILE, ALABAMA PHONE 471-5474 Z

BRANCHES: FAIRHOPE, ALABAMA . JACKSON, ALABAMA Winyl flooring. carpets. tiles. inlaid linoleum. formica. 2000 blocks

Cal Taylor Construction Company

Post Office Box 309

OLD TO

Robertsdale, Alabama

Invoice Nº 2250

January 31, 1964

1% Service Charge Per Month on all Accounts Over 30 Days, Unless Prior Agreement.

JOB NO. 1767 - Your Job #10 JOB NO. 1955 - CHILDERS JOB JOB NO. 2317 - WILTERS JOB

- (1) Installation of Inlaid Linoleum, Carpet,
- (2) Installation of Inlaid Linoleum, Carpet,
 - and Sand and Finish Work on Childers Job .. \$ 985.00

and Sand and Finish Work on Job No. 10 \$ 430.59

TOTAL \$1837.59

The above is a just and accurate account of the amount owed

The above is a just and accurate account of the amount owed Thorpe's, Inc., after allowance for any and all set-offs or counterclaims.

Sworn to and subscribed before me this 9th day of Edurary 1964.

RHam Thanks A

The State of Alabama,	Circuit Court, Baldwin County
Baldwin County.	No
manufacturity.) TERM, 19
TO ANY SHERIFF OF THE S	
You Are Commanded to Summon	Cal Taylor, individually and d/b/a Cal Taylor
Construction Company; Co	al Taylor Construction Company, a corporation
o appear and plead answer or de-	
	, 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 Defendant
	Chorpeis, Inc., an Alabama corporation
	, Plaintiff
Witness my hand this	7
EU-2-22-64	Much Duck Clerk
5.	

No. 5971 Page	Jum Call 3390	
	Defendant lives at	
STATE of ALABAMA	Detendant fives at	
Baldwin County	Robertsdale, Alabama	
CIRCUIT COURT	Received In Office	
	2/14, 196/	
Thorpes, Inc.	and the last	
An Alabama Corp	Sheriff.	
Plaintiffs	I have executed this summons	
vs.	this 72h. 22 196	
Cal Taylor	by leaving a copy with	
	(ab)m/m/	
Defendants		
Summons and Complaint		
Filed		
alice france & Clerk	Sheriff claims	
Clerk Clerk	Ten Cents per mile Total & 2	
	BY — DEPUTY SHERIFF	
	DEPOLIT PLEASE	
Plaintiff's Attorney	Mayund als ins	
Defendant's Attorney	Sheriff,	
	Deputy Sheriff.	
	Disoula	
	11.2	