

INSTRUCTIONS

SENDER:

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

RECIPIENT:

Write your reply at bottom, mail back white sheet and keep the pink.

NCR
REGISTERED U.S. PATENT OFFICE
OF THE PATENT AND TRADE MARK
OFFICE, WASHINGTON, D.C.

T
O
Mrs. Alice J. Duck, ϕ
Clerk of Circuit Court
Baldwin County Court House
Bay Minette, Alabama

F
R
O
M

JOHN V. DUCK & RICHARD C. LACEY
Attorneys At Law
319 Magnolia Avenue
FAIRHOPE, ALABAMA

SUBJECT:

B.I. Reynolds Vs. Louis J. Wacker
Reynolds Boat Works, Inc. Vs. Thomas O. Bryars, Jr.

DATE:

5/6/64

Message - Reply

FOLD A

THIS IS NCR (NO CARBON REQUIRED) PAPER.

{ JUST TYPE (OR WRITE) ON ORIGINAL. YOUR IMPRESSION
WILL AUTOMATICALLY APPEAR ON COPIES BENEATH.

Form #7 - New England Business Service, Inc., Townsend, Mass.

ENCLOSURES: Summons and Complaints on the two subject cases.
Please have served and notify us of service on same.

Thank you,

6049
John V. Duck

JOHN V. DUCK

R

SIGNED:

DATE OF REPLY:

REPLY TO:

SIGNED:

SENDER: MAIL RECIPIENT WHITE AND PINK SHEETS

RECIPIENT: WRITE REPLY. RETURN WHITE TO SENDER. KEEP THIS PINK COPY.

Reynolds Boatworks

DS

Thomas A. Byars

JURY LIST - MAY 31, 1965

- 6049
1. Anacker, Walter R., Farmer, Fairhope
 2. Beaty, Raymond, Laborer, Fairhope
 3. Beck, John, Mechanic, Foley
 4. Broughton, Joe N., Merchant, Cross Roads
 5. Bryhn, Vernon A., Farmer, Elberta
 6. Carlisle, D.E., Newport, Bay Minette
 7. Carlisle, Otis A., Newport, Bay Minette
 8. Corley, Horace W., Brookley Field, Bay Minette
 9. Crook, Prince, Laborer, Bay Minette
 10. Drinkard, Everette E., Farmer, Bay Minette
 11. Dusek, Frank J., Jr., Civil Service, Lillian
 12. Ebert, Charles J., Jr., Ins. Agt., Foley
 - ~~13. Ebert, Charles J., Jr., Post Office Clerk, Foley~~
 14. Fell, Frank, Mechanic, Elberta
 15. Fell, Neal J., Farmer, Lillian
 16. Frank, George, Farmer, Elberta
 17. Gilbert, B.B., Mechanic, Bay Minette
 18. Gilbert, Jimmy, Insurance, Robertsdale
 19. Hall, Gerald B., Jr., Newport, Bay Minette
 20. Hall, Origen, Club Operator, Bay Minette
 21. Hamilton, Percy, Town of Bay Minette, Bay Minette
 22. Harrison, Joseph M., Farmer, Fairhope
 23. Henderson, James M., Farmer, Fairhope
 24. Hobbs, William G., Merchant, Bay Minette
 25. Hodges, Willie Lee, Sawmill, Bay Minette
 - ~~26. Homan, Pierce E., Electrician, Stockton~~
 27. Keuler, Albert, Salesman, Loxley
 28. Keuler, Jake W., Farmer, Loxley
 29. King, Morace E., Farmer, Mag. Spgs.
 30. McCarthy, James G., Merchant, Bay Minette
 31. Meszaros, Michael A., Retired, Elberta
 32. Morse, Wilson W., Civil Service, Foley
 33. Nix, B. Coles, Ag. Teacher, Foley
 34. Palmer, James J., Farmer, Robertsdale
 35. Bridgen, J. Phillip, Farm Adm., Bay Minette
 36. Ryan, Robert, Newport, Bay Minette
 37. Seaburn, James, Farmer, Foley
 - ~~38. Simon, Gordon, Farmer, Daphne~~
 39. Stimpson, Carl, Clay Products, Fairhope
 40. Toler, Johnnie G., Electrician, Foley
 41. Trawick, Walter, Laborer, Bay Minette
 42. Underwood, Hilary H., Farmer, Foley
 43. Vasut, Charles F., T.V. Repair, Robertsdale
 44. Weekley, Willard A., Newport, Bay Minette
 45. Wilson, John R., Auto. Dealer, Bay Minette
 - ~~46. Wilson, John R., Auto. Dealer, Bay Minette~~
 47. Mikkelson, Roy, Farmer, Summerdale
 48. Stuart, Harold, Cleaners, Bay Minette
 49. Fuller, David, Motel, Spanish Fort-Daphne

D XXXXX XXV

D XXXXX XXX

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18

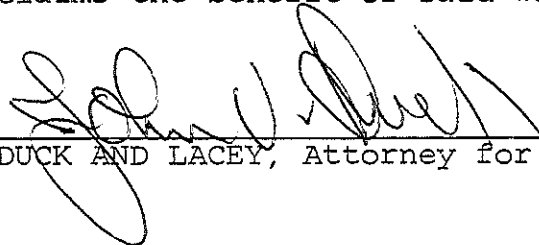
REYNOLDS BOAT WORKS, INC., a Corpora-) IN THE CIRCUIT COURT OF
tion,)
Plaintiff) BALDWIN COUNTY, ALABAMA
VS.) AT LAW
THOMAS O. BRYARS, JR.,) 6049
Defendant)

Plaintiff claims of the Defendant the sum of SIX HUNDRED SEVENTY-FOUR DOLLARS AND 60/100 DOLLARS (\$674.60), due by Promis- sory Note made by him on the 2nd day of August, 1962, and payable in twenty-four (24) equal installments of THIRTY-SEVEN DOLLARS (\$37.00) each beginning on the 6th day of September, 1962.

That in and by the terms of said note the Defendant agreed that default in any one payment would mature the entire obligation, and Plaintiff now avers that the Defendant did default, and claims the entire balance due and payable.

That in and by the terms of said note the Defendant agreed that in the event this note turned over for collection, whether by suit or otherwise, that Defendant agreed to pay reason- able attorneys fee, and the Plaintiff now claims the further and additional sum of ONE HUNDRED TWENTY-FIVE AND NO/100 DOLLARS (\$125.00) as a reasonable attorneys fee.

That in and by the terms of said note, the Defendant waived all rights of exemption under the Constitution and laws of Alabama, and the Plaintiff now claims the benefit of said waiver.


DUCK AND LACEY, Attorney for Plaintiff

Defendant can be served at
RFD No. 1, Box 149-A, Daphne,
Alabama.

FILED

MAY 8 1964

ALICE L. DUCK, CLERK
REGISTER

721

REYNOLDS BOAT WORKS, INC., a
corporation

Plaintiff

vs

THOMAS O. BRYARS, JR.

Defendant

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6049

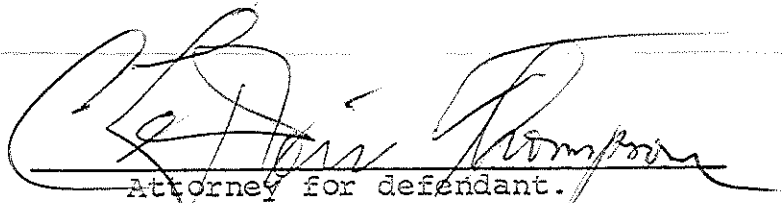
Comes the defendant and for answer to the complaint filed
in the above styled cause shows unto this Honorable Court as
follows:

-1-

He denies the allegations of said complaint as untrue.

-2-

The defendant for answer to the said complaint saith
that he has paid the debt for the recovery of which this
suit was brought before the action was commenced.


Attorney for defendant.

FILED

APR 27 1965

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6049

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon THOMAS O. BRYARS, JR.

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.....

.....THOMAS O. BRYARS, JR......, Defendant.....

by REYNOLDS BOAT WORKS, INC., a corporation,.....

.....Plaintiff.....

Witness my hand this 8 day of May 1964
Alice J. Luck Clerk

67-6-23-64

No. 6049 Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

REYNOLDS BOAT WORKS, INC.,

a corporation

Plaintiffs

vs.

THOMAS O. BRYARS,

S p. Fort

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....
MAY 8 1964

ALICE J. DUCK, CLERK
REGISTER

DUCK AND LACEY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RFD No. 1, Box 149-A,
Daphne, Alabama

Received In Office

5/8 19*64*

Sheriff

I have executed this summons

this *23rd* June 19*64*

by leaving a copy with

Thomas O. Bryars

Sheriff claims *40* miles at

Ten Cents per mile Total \$ *4.00*
TAYLOR WILKINS, Sheriff

BY *Deputy*
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Fred Seibert Deputy Sheriff

malbis

REYNOLDS BOAT WORKS, INC., a
corporation

Plaintiff

vs

THOMAS O. BRYARS, JR.

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

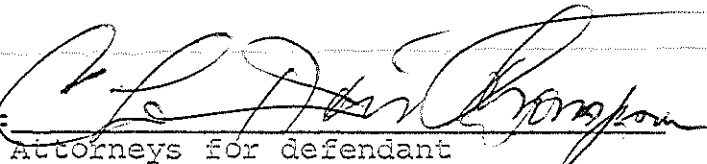
NO. 6049

Comes the defendant in the above styled cause and demurs to
the complaint filed in said cause and as grounds for said demurrer
shows unto this Honorable Court as follows:

1. That said complaint fails to state a cause of action.
2. That said complaint fails to allege that said note is
payable to the plaintiff herein.

THOMPSON & WHITE

BY:


Attorneys for defendant

Defendant respectfully requests trial by jury.


Attorney for defendant

FILED

JUL 16 1954

ALICE L. DICK, CLERK
REGISTER