

TELEPHONE 928-9836

LAW OFFICES

P.O. BOX 471

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532

July 22, 1965

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

Dear Mrs. Duck:

Inre: Chas. A. Born Co., Inc.
Vs: Spanish Fort Plumbing
Our File: 65-195

With this we are handing you Summons & Complaint in the above
styled cause together with deposit for costs in the sum of
\$25.00.

Please process and oblige.

Yours very truly,



EGR/jlb

Encls.

8-3-65

cc: Dun & Bradstreet, Inc.
cc: Charles A. Born

STATE OF ALABAMA
COUNTY OF BALDWIN

CIRCUIT COURT, BALDWIN COUNTY,
NO. _____
_____ TERM, 1965.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon T. C. BETHEA, Individually, and doing business as SPANISH FORT PLUMBING, 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 T. C. BETHEA, Individually, and doing business as SPANISH FORT PLUMBING, Defendant, by CHARLES A. BORN COMPANY, INC., a corporation, Plaintiff.

WITNESS my hand this 26 day of July, 1965.

Alice J. Duck Clerk.

CHARLES A. BORN COMPANY, INC.,
a Corporation,
Plaintiff,

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA,

T. C. BETHEA, Individually,
and d/b/a SPANISH FORT
PLUMBING,
Defendant.

AT LAW.

6601

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant ONE THOUSAND EIGHT HUNDRED THIRTY-THREE AND 03/100 (\$1,833.03) DOLLARS due from him by account, on, to-wit, the 31st day of January, 1964, which sum of money with the interest thereon is still unpaid.

Count II.

The Plaintiff claims of the Defendant the sum of ONE THOUSAND EIGHT HUNDRED THIRTY-THREE AND 03/100 (\$1,833.03) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 31st day of January, 1964, which sum of money with the interest thereon is still unpaid.

FILED

JUL 26 1965

ALICE J. DUCK, CLERK
REGISTER

Defendant's address is Route 1, Daphne, Alabama.

64-7-30-65

E. G. RICKARBY, Attorney for
Plaintiff.

6601

Charles R. Barn Co.
Incr. a corp.

vs.

J. C. Bethea Ind + d/b/a
Spanish Fort Plumbing

Received 26 day of July 1965
and on 30 day of July 1965
I served a copy of the within A & C
on J. C. - Bethea

By service on J. C. Bethea
Jayn Wilkins
TAYLOR WILKINS, Sheriff
By Roy Randall D. S.

Daphne

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff
BY Roy Randall
DEPUTY SHERIFF

FILED

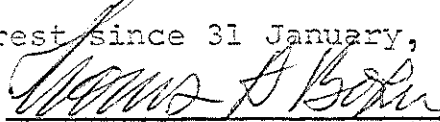
JUL 26 1965

ALICE J. DICK, CLERK
REGISTER

E. D. Rickaby

STATE OF FLORIDA,
ESCAMBIA COUNTY.

Personally appeared before me, the undersigned Notary Public, THOMAS A. BORN, who being duly sworn, deposes and says that he is the President of CHARLES A. BORN COMPANY, INC., and as such has personal knowledge of the account of CHARLES A. BORN COMPANY, INC., with T. C. BETHEA, who was doing business as SPANISH FORT PLUMBING COMPANY and that the said T. C. BETHEA is justly indebted to CHARLES A. BORN COMPANY, INC., in the sum of ONE THOUSAND EIGHT HUNDRED THIRTY-THREE AND 03/100 (\$1,833.03) DOLLARS with interest since 31 January, 1964.


THOMAS A. BORN, President
CHARLES A. BORN COMPANY, INC.

Subscribed and sworn to before me this the 24 day of
SEPTEMBER, 1965.


Notary Public, State of Florida,
County of Escambia.

NOTARY PUBLIC STATE OF FLORIDA at LARGE
MY COMMISSION EXPIRES OCT. 8, 1967.
BONDED THROUGH ERIC W. DIESTELHORST

