

JAMES W. HOWELL
ATTORNEY AT LAW
P. O. BOX 206 — PHONE WH 3-3602
FOLEY, ALABAMA

March 6, 1965

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Enclosure: Summons and Complaint--Reynolds Brothers Lumber Co.
vs
Shirley Construction Co.

6423

JAMES W. HOWELL
ATTORNEY AT LAW
P. O. BOX 206 — PHONE WH 3-3602
FOLEY, ALABAMA

April 21, 1965

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Dear Mrs. Duck:


Re: Reynolds Brothers Lumber Co.
Vs: Shirley Construction Co.

According to my records, Plaintiff is entitled to a judgment by default against the Defendant. Please place the file before Judge Mashburn for a judgment based on the following figures:

Account Balance	\$693.40
Interest	
1-10-64 to 3-10-64	<u>69.33</u>
Total	\$762.73

Thank you for your usual prompt attention to this matter. I shall look forward to receipt of the certificate of judgment.

Most cordially,


James W. Howell

JWH:j

REYNOLDS BROTHERS LUMBER COMPANY,
INC., a corporation,

PLAINTIFF,

vs

J. M. SHIRLEY, individually, and
d/b/a SHIRLEY CONSTRUCTION COMPANY,

DEFENDANT.

) IN THE CIRCUIT COURT OF


) BALDWIN COUNTY, ALABAMA

) AT LAW, NO. 6423

COUNT ONE

Plaintiff claims of the Defendant the sum of SIX
HUNDRED NINETY-THREE & 40/100 DOLLARS (\$693.40) due from him
by account, on to-wit: the 10th day of JANUARY
1964, which sum of money, with interest thereon, is now
due and payable.

An itemized, verified statement of the account is
attached hereto and forms a part hereof.


JAMES W. HOWELL
Attorney for Plaintiff

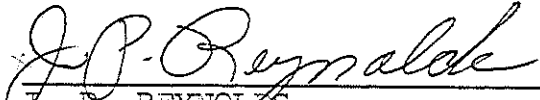
FILED

MAR 10 1965

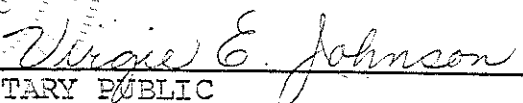
ALICE L. DICK, CLERK
REGISTER

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Before me, the undersigned authority in and for aforesaid State and County, who as a Notary Public under my seal of office, which seal of office is hereto attached, personally appeared J. P. REYNOLDS, who is known to me, being duly sworn, upon his oath stated he is President of REYNOLDS BROTHERS LUMBER COMPANY, INC., a corporation organized and doing business under the laws of the State of Alabama; that as such he makes this affidavit; that he is familiar with the books and business of REYNOLDS BROTHERS LUMBER COMPANY, INC., that the attached account against J. M. SHIRLEY, individually and d/b/a SHIRLEY CONSTRUCTION COMPANY is just and correct within the knowledge of the affiant; that he has authority to make this affidavit and that he has personal knowledge of the matters contained herein; that the items thereon stated and composing the said account were sold and delivered to the said J. M. SHIRLEY, individually and d/b/a SHIRLEY CONSTRUCTION COMPANY at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which account is entitled as thereon stated and that the balance thereof amounting to the sum of SIX HUNDRED NINETY-THREE & 40/100 DOLLARS (\$693.40) with interest from the 10TH day of JANUARY 1964 is justly due and remains unpaid.


J. P. REYNOLDS

Subscribed and sworn to before
me this 4th day of March, 1965.


NOTARY PUBLIC

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

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 J. M. SHIRLEY, individually and
d/b/a SHIRLEY 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 J. M. SHIRLEY
individually and d/b/a SHIRLEY CONSTRUCTION COMPANY, Defendant.....

by
REYNOLDS BROTHERS LUMBER COMPANY, INC., a corporation, Plaintiff.....

Witness my hand this 10 day of March 19 45
64-3-18-65 Chief Clerk, Clerk

Gulf Shores

No. *14422* Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

REYNOLDS BROTHERS LUMBER COM-

PANY, INC., a corporation
Plaintiffs

vs.

J. M. SHIRLEY, individually and
d/b/a SHIRLEY CONSTRUCTION COM-
PANY

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

..... *3-10-1965* Clerk

MADE J. DUCK, CLERK
RECEIVED

James W. Howell

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Gulf Shores, Alabama

Received In Office

3-10- 19*65*

Sheriff

I have executed this summons

this *March 18* 19*65*
by leaving a copy with

Jm Shirley

Sheriff claims *100* miles at

Ten Cents per mile Total \$ *10.00*
TAYLOR WILKINS, Sheriff

BY *Jm Eastman*
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Jm Eastman Deputy Sheriff

Gulf Shores