

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6443

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon M. I. FOREMAN

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

M. I. FOREMAN

Defendant

by REYNOLDS BROTHERS LUMBER COMPANY, INC., a corporation

Plaintiff

Witness my hand this 19 day of March 1945

Clerk

REYNOLDS BROTHERS LUMBER COMPANY,	)	IN THE CIRCUIT COURT OF
INC., a corporation,	)	
	)	BALDWIN COUNTY, ALABAMA
PLAINTIFF,	)	
	)	
vs	)	
	)	
M. I. FOREMAN,	)	
	)	
DEFENDANT.	)	AT LAW, NO. _____

COUNT ONE

Plaintiff claims of the Defendant the sum of NINE HUNDRED THIRTY-SEVEN & 66/100 DOLLARS(\$937.66) due from him by account, on to-wit: the 3<sup>rd</sup> day of September 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

# Reynolds Brothers Lumber Co., Inc.

FOLEY, ALABAMA

PLEASE  
This by  
Foley.

M. I. FOREMAN  
P. O. BOX 1337 P.O. Box 397  
WATKINS, ALABAMA  
POINT, CLEAR.

All Bills MUST Be Paid By 10th

Per Mr. 1  
10/16/63. 10 day

DATE	INVOICE NO.	DEBITS	CREDITS	BALANCE
MAY 29, 1961			BALANCE FORWARD	71.29
MAY 2 63	9.570	197.03		268.32
MAY 8 63 A	9.854	159.80		428.12
MAY 13 63	2.264	134.40		562.52
MAY 13 63 A	14	13.66		573.18
MAY 13 63 A	23		18.03-	555.15
MAY 24 63	313	18.03		573.18
MAY 27 63	1.203		573.13-	0.00
MAY 28 63 A	1.395	256.52		256.52
MAY 29 63	1.432	364.83		621.40
MAY 31 63	1.527	212.10		833.50
MAY 31 63	1.593	2.05		835.55
MAY 31 63 A	1.779	167.25		1,002.82
MAY 31 63	1.755		4.64-	998.18
MAY 31 63	1.984	161.59		1,159.77
MAY 31 63 A	2.043	47.23		1,207.03
MAY 31 63 A	2.071		125.79-	1,081.24
MAY 31 63	2.056	14.94		1,095.20
MAY 31 63	2.431	4.31		1,099.51
MAY 31 63	2.432	1.55		1,101.07
<del>MAY 31 63</del>	<del>3.517</del>	<del>10.02</del>		<del>1,111.05</del>
<del>MAY 31 63</del>	<del>3.517</del>	<del>40.40</del>		<del>1,151.45</del>
<del>MAY 31 63</del>	<del>3.517</del>	<del>78.00</del>		<del>1,229.45</del>
DEC 5 63 A	6.209	125.75		1,226.85
DEC 9 63 A	6.306	124.36		1,351.21
DEC 14 63	6.542	105.33		1,456.54
FEB 3 64	3.667		456.54-	1,000.00
APR 18 64	4.537	37.66		1,037.66
SEP 3 64	8.726		100.00-	937.66

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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 M. I. FOREMAN is  
just and correct within the knowledge of this affiant; that  
he has authority to make this affidavit and that he has per-  
sonal knowledge of the matters contained herein; that the  
items thereon stated and composing said account were sold and  
delivered to the said M. I. FOREMAN 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 NINE HUNDRED THIRTY-SEVEN & 66/100  
DOLLARS (\$937.66) with interest from the 3<sup>rd</sup> day of  
September 1964 is justly due and remains unpaid.

  
J. P. REYNOLDS

Subscribed and sworn to before  
me this 12<sup>th</sup> day of March 1965.

  
NOTARY PUBLIC

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

REYNOLDS BROTHERS LUMBER

COMPANY, INC., a corporation

Plaintiffs

vs.

M. T. FOREMAN

Defendants

SUMMONS AND COMPLAINT

Filed 3-19-65 19.....

Clerk

James W. Howell

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Point Clear, Alabama

Received In Office

MAR 19 1965

TAYLOR WILKINS Sheriff

I have executed this summons

this 3/22 1965  
by leaving a copy with

M. T. Foreman

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS Sheriff

by Roy Randle  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Roy Randle Deputy Sheriff

J. Hype

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

May 1, 1965

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

Dear Mrs. Duck:

According to my records, the Plaintiff is entitled to a judgment by default against the Defendant in each of the cases listed below. Please issue and mail me a certificate of judgment based on the following figures:

re: Reynolds Brothers Lumber Company  
vs: M. I. Foreman

Amount of Account Due	\$937.66
Interest	<u>43.40</u>

\$981.06


re: Reynolds Brothers Lumber Company  
vs: Jubilee Shores Development Corp.

Amount of Account Due	\$1016.09
Interest	<u>101.58</u>

\$1117.67

Thank you for your usual prompt attention to this request.

Most cordially,

  
James W. Howell

JWH:j