

P.O. DRAWER A-J

RICHARD C. LACEY

TELEPHONE 928-2373

Attorney at Law

FAIRHOPE, ALABAMA

May 3, 1966

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

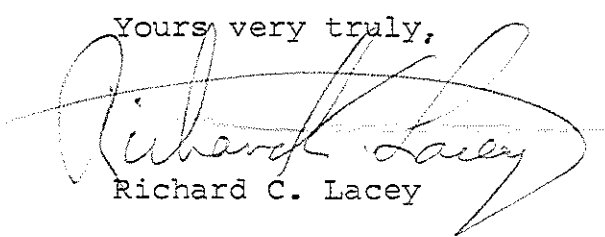
RE: Gulf Flooring and Supply, Inc. 6958
Vs.
J. P. Klein

RE: Atlas Finance Company, Inc.
Vs. 6959
Jim and Addie Heard

Dear Mrs. Duck:

Enclosed is Summons and Complaint in each of subject cases.
Please file and have served.

Yours very truly,


Richard C. Lacey

Encl.

RCL:W

GULF FLOORING AND SUPPLY, INC.,
a corporation,

Plaintiff

VS.

J. P. KLEIN,

Defendant

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW

) CASE NO. 16958

)

)

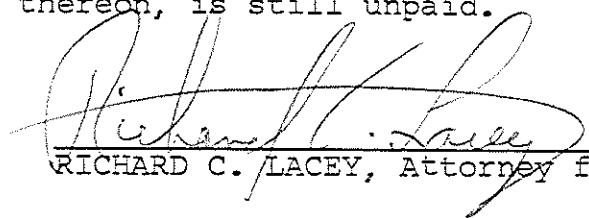
BILL OF COMPLAINT

I

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED TWENTY-FOUR AND NO/100 DOLLARS (\$524.00), due from him on account, to-wit, the 31st day of May, 1965, which sum of money with the interest thereon, is still unpaid.

II

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED TWENTY-FOUR AND NO/100 DOLLARS (\$524.00), due from him for merchandise, goods, chattels and services furnished by the Plaintiff to the Defendant on, to-wit, the 31st day of May, 1965, which sum of money with the interest thereon, is still unpaid.


RICHARD C. LACEY, Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof, an Itemized Statement of account, verified by Mark Lyons, III, a competent witness sworn to before a Notary Public, which statement shows the amount due on this account as of the 31st day of May, 1965, and due at present.

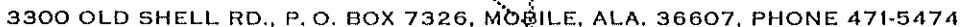
Defendant resides at

East Fairhope Avenue
Fairhope, Alabama

FILED

MAY 5 1965

AUG L. DICK, CLERK
REGISTERED



- 1% SERVICE CHARGE PER MONTH ON ALL ACCOUNTS OVER 30 DAYS, UNLESS PRIOR AGREEMENT.

PLEASE PAY THE LAST FIGURE IN THIS COLUMN

TERMS: ALL INVOICES PAYABLE NET BY 10TH OF MONTH FOLLOWING PURCHASE.

GULF FLOORING AND SUPPLY, INC.

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. P. Klein

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. P. Klein

Defendant.....

by

GULF FLOORING AND SUPPLY, INC., a corporation..... Plaintiff.....

Witness my hand this 5th day of May, 1966.

Alice J. Luck Clerk

EX-5-6-66

No. 6958

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

GULF FLOORING AND SUPPLY, INC.,
a corporation

Plaintiffs

vs.

J. P. KLEIN

Defendants

SUMMONS AND COMPLAINT

Filed MAY 5 1966 19.....

ALICE J. DICK, CLERK
REGISTER

RICHARD C. LACEY
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

8-8044

Defendant lives at

East Fairhope Avenue
Fairhope, Alabama

RECEIVED
Received In Office

MAY 5 1966 19.....

TAYLOR WILKINS Sheriff

I have executed this summons

this 5-6 1966

by leaving a copy with

J. P. Klein

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff
BY Ray Randall
DEPUTY SHERIFF

R. Randall Deputy Sheriff

J. H. Hays

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6959

TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Jim Heard and Addie Heard, jointly and
severally

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.....

Jim Heard and Addie Heard, jointly & several Defendant.....

by

Atlas Finance Company, Inc., a corporation....., Plaintiff.....

Witness my hand this 5th day of May 1966

Allice J. Black Clerk

No. 6959

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ATLAS FINANCE COMPANY, INC.,
a corporation

Plaintiffs

vs.

Jim Heard and Addie Heard,
jointly & severally Defendants

SUMMONS AND COMPLAINT

FILED

Filed MAY 3 1966 19.....

ALICE S. BUCH, CLERK
CLERK

RICHARD C. LACEY
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Twin Beach Road, Fairhope, Ala.
(Works at Grand Hotel)

Received In Office

MAY 3 1966

TAYLOR WILKINS

SHERIFF

19.....

Sheriff

I have executed this summons

this 5-6-1966 19.....

by leaving a copy with

Jim Heard (Fairhope)
Addie Heard "

140
14.00
Roy Randall
SHERIFF

Sheriff

R. Randall Deputy Sheriff

ATLAS FINANCE COMPANY, INC.,)
a corporation,

Plaintiff,

VS.

JIM HEARD and ADDIE HEARD,
jointly and severally,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 6959

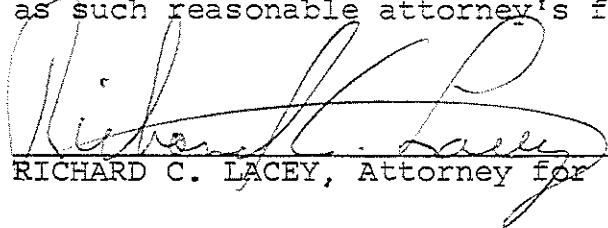
BILL OF COMPLAINT

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED TWENTY-EIGHT AND NO/100 DOLLARS (\$528.00), due by promissory note, made by Defendant on October 9, 1963.

Plaintiff further avers that in and by the terms of said note, the Defendant agreed to pay interest at the rate of eight percent (8%) per annum from maturity, and Plaintiff claims of the Defendant such interest.

Plaintiff further avers that in and by the terms of said note, the Defendant waives notice of presentment and all right of exemption under the Constitution and Laws of Alabama, or any other State, as to personal property, as to which waiver the Plaintiff now claims the benefit.

Plaintiff further avers that in and by the terms of said note, the Defendant agreed to pay all costs of collection or securing or attempting to collect or secure said note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of ONE HUNDRED SEVENTY-SIX AND NO/100 DOLLARS (\$176.00) as such reasonable attorney's fee.


RICHARD C. LACEY, Attorney for Plaintiff

Defendant resides

Twin Beach Road
Fairhope, Alabama

FILED

MAY 3 1966

ALICE L. DICK, CLERK
REGISTER