CODE 205 Telephone: 928-9836

E. G. RICKARBY

35 South Section Street FAIRHOPE, ALABAMA 36532

September 26, 1967

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

Dear Mrs. Duck:

Inre: Material Sales Co., Inc.

Vs: Paul McCullough

File: 67-15

Enclosed find Summons and Complaint of Ruffles Company, a corporation Vs Paul McCullough. Please process and have it sent to the Sheriff for service on Mr. McCullough in Brewton, Alabama.

Yours very truly,

Elik Cell

EGR/gk

10-6-67 cc: Ruffles Company

STATE OF ALABAMA,

CIRCUIT NO. 14	COURT,	BALDWIN	COUNTY,
NO. 18	21		
		PI	RM,1967.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon PAUL McCULLOUGH 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 PAUL McCULLOUGH, Defendant, by RUFFLES COMPANY, a Corporation, Plaintiff.

WITNESS my hand this 4 day of //cf , 1967.

dein duck Clerk.

RUFFLES COMPANY, a Corpo	ration, Q	
Plai	ntiff, 0	IN THE CIRCUIT COURT OF
Vs.	Ŏ	BALDWIN COUNTY, ALABAMA,
PAUL McCULLOUGH,	Ŏ	AT LAW.
Defe	endant. Q	

COMPLAINT

Count I.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FIFTY FOUR AND 59/100 (\$354.59) DOLLARS for work and labor done by the Plaintiff at the request of the Defendant on a building or improvements on the following described property, to-wit:

Lot Two Fairwood Subdivision Number One, Subdivision of Fairhope, Baldwin County, Alabama.

which said indebtedness accrued on, to-wit, the 1st day of August, 1967, and is now due and unpaid.

The Plaintiff alleges that the above described property was the property of PAUL McCULLOUGH, that the work or labor was done or performed on said building or improvements on said land under, and by virtue of, a contract with the said PAUL McCULLOUGH, the owner or proprietor thereof, that within six months after said indebtedness had matured, on, to-wit,

Cont'd, Summons & Complaint: Ruffles vs. McCullough.

the 8th day of August, 1966, the Plaintiff did file in the Office of the Judge of Probate of the County wherein said land is situated, a verified statement as required by law, a copy of which is hereby attached and made a part hereof, and marked, "Exhibit A".

WHEREFORE, the Plaintiff claims a lien for said amount upon said land and buildings and improvements situated thereon.

Count II.

The Plaintiff claims of the Defendant THREE HUNDRED FIFTY FOUR AND 59/100 (\$354.59) DOLLARS due from him by account, on, to-wit, the 1st day of August, 1967, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

E. G. RICKARBI, Attorney in the Plaintiff.

Paul McCullough's address is: 506 Douglas Avenue, Brewton, Alabama.

NOV 4 1967

P. O. DRAWER K

FAIRHOPE, ALABAMA 36532

DEPT.

D USED	STOCK NO.	ITEM		NO.	UNIT PRICE	PRICE
		•				
				, ,		
						
SH TRUCK	S AND EQUIPMEN	IT FOR MEN WHOSE SER. FUSIE	D		MATERIAL	
SE ACTUAL	LLY IS FOR SERV	ICES, EQUIPMENT AND		:	SALES TAX	10
	SH TRUCK E RENDERI GE ACTUAL	SH TRUCKS AND EQUIPMEN ERENDERED—THEREFORE V GE ACTUALLY IS FOR SERV	E RENDERED-THEREFORE WHILE LISTED AS SERVICE GE ACTUALLY IS FOR SERVICES. EQUIPMENT AND	SH TRUCKS AND EQUIPMENT FOR MEN WHOSE SER- E RENDERED—THEREFORE WHILE LISTED AS SERVICE GE ACTUALLY IS FOR SERVICES, EQUIPMENT AND	SH TRUCKS AND EQUIPMENT FOR MEN WHOSE SER- E RENDERED—THEREFORE WHILE LISTED AS SERVICE GE ACTUALLY IS FOR SERVICES, EQUIPMENT AND	SH TRUCKS AND EQUIPMENT FOR MEN WHOSE SER- E RENDERED—THEREFORE WHILE LISTED AS SERVICE GE ACTUALLY IS FOR SERVICES, EQUIPMENT AND

INCORPORATED
P. O. DRAWER K

-				F. O. DRAWER K FAIRHOPE, ALABAMA 36532	DE	PT		· · · · · · · · · · · · · · · · · · ·	
NAM	E Z	A STATE OF THE STA	<i></i>	BING - HEATING - ELECTRICAL -		DITIONIN ATE -	G - 1	and the same of th	spirito.
ADDI	RESS								-
NATI	JRE OF	WOF	RK						
TAKE	RET'D USED		USED STOCK NO. ITEM			NO. UNIT PRICE		PRIC	CE
								-	
				Jump out settle	garage and from		***************************************		
*					приграми.			35	- (Table)
								22	41
er eng									
				je.					

······									<u> </u>
·							-		
							-		
WE FU	JRNISH ARE RE	TRUCK	S AND EQUIP	INESS IT IS NECESSARY THAT MENT FOR MEN WHOSE SER- RE WHILE LISTED AS SERVICE ERVICES, EQUIPMENT AND			MATERIAL SALES TAX		
COST	OF OP	ERATI	ON FOR WHI	CH NO SEPARATE CHARGE IS PLEASE	NOTE -		SERVICES		
MEC	HANK					TOTAL	. CHARGES	75	100

MECHANIC.

Ruffles Co.

INCORPORATED P. O. DRAWER K

P. O. DRAWER K

ADDRESS NATURE OF WORK		and the second
The first of the state of the s		·····
TAKE RET'D USED STOCK NO. ITEM NO.	UNIT PRICE	
Cameril	- Chilirates	PRICE
		30
	:	
	:	
DUE TO THE NATURE OF THIS BUSINESS IT IS NECESSARY THAT WE FURNISH TRUCKS AND EQUIPMENT FOR MEN WHOSE SER- POSTED	MATERIAL	30
VICES ARE RENDERED—THEREFORE WHILE LISTED AS SERVICE THE CHARGE ACTUALLY IS FOR SERVICES. EQUIPMENT AND	SALES TAX	11
COST OF OPERATION FOR WHICH NO SEPARATE CHARGE IS MADE. PLEASE NOTE	i —	3/1/1/3

P. O. DRAWER K FAIRHOPE, ALABAMA 36532 HEATING - ELECTRICAL - AIR CONDITIONING

NAME		A Town	Exer S	Mo Cellinal,	DATE		And the same of th				
ADDR				· · · · · · · · · · · · · · · · · · ·		- Company					
NATU	RE OF	WOR	K (d	much free, to lety for	a great of Sand		· · · · · · · · · · · · · · · · · · ·				
TAKE	RET'D	USED	STOCK NO.	ITEM	NO.	UNIT PRICE	PRICE				
44				4"+ C 122 1		,50	222.00				
1			***	4" to Lake		1,40	1. 4/3				
1				4"+ C W/ Le		1.45	1.45				
				4"40 - 13.12		1.400	7.80				
37				a dakem		.49	.98				
1 deformation				Camant		104	52				
_/				2. 15 to 4. Cop		3.00	3.00				
				4"CW X4" Le abo.		1.90	1.90				
/				410W X42CT		1.25	1. 75				
	,			Can Carlen & Comont		. 25	, 25				
50				4" C. W. Shall and		155	44.10				
			***************************************	4" CW + 4" 4 C. Alm.		1.90	1.9,				

DUE TO THE NATURE OF THIS BUSINESS IT IS NECESSARY THAT WE FURNISH TRUCKS AND EQUIPMENT FOR MEN WHOSE SER-VICES ARE RENDERED-THEREFORE WHILE LISTED AS SERVICE THE CHARGE ACTUALLY IS FOR SERVICES, EQUIPMENT AND

MADE.

COST OF OPERATION FOR WHICH NO SEPARATE CHARGE IS

PLEASE NOTE

SALES TAX SERVICES

MATERIAL

MECHANIC.

TOTAL CHARGES

1% PER MONTH SERVICE CHARGE WILL BE ADDED TO ALL ACCOUNTS AFTER 30 DAYS FROM DATE OF BILLING.

POSTED

P. O. DRAWER K
FAIRHOPE, ALABAMA 36532

0000		
DEPT	 	

NATURE OF WORK Council for the Conference of the Council for t										
TAKE	RET'D	USED	STOCK NO.	100	ITEM			No.	UNIT PRICE	PRICE

							····			
· · · · · · · · · · · · · · · · · · ·										
						·				
				Application of the state of the						
WE FU	RNISH 7	RUCKS	AND EQUIPM	NESS IT IS NECESSARY THAT ENT FOR MEN WHOSE SER-	POS	TED			MATERIAL	
VICES THE CI	are rei Iarge a	VDEREI CTUALI	THEREFORE	WHILE LISTED AS SERVICE					SALES TAX	
COST MADE.	OF OPE	RATIO	ON FOR WHIC	H NO SEPARATE CHARGE IS		PLEASE	NOTE -	à	SERVICES .	20 75
MEC	IANIC				L			4 7		
141 C C			***************************************					70741	CHARGES	1

MECHANIC_

Ruffles Co.

P. O. DRAWER K

FAIRHOPE, ALABAMA 36532

HEATING - ELECTRICAL - AIR CONDITIONING

DEPT.

TAKE RET'D U		USED	STOCK NO.	ITEM	NO.	UNIT PRICE	PRI	CE
				2-816 Mully		37.50	7	50
1				Metor Revised sol		17.35	17	33
4/				Motor Myent Troller		35	1,	4/1
J.			·	fell rabe denskram		125		300
1		·		2-11124 UBelt		1.95		94
1				2-11/25 11 1884		7.05		05
						····	188	

			-					

-								
							,	
UE TO	THE N	ATURE TRUCKS	OF THIS BUS	MESS IT IS NECESSARY THAT MENT FOR MEN WHOSE SER- POSTED		MATERIAL	7	176
/ICES THE CH	ARE RE	NDERE	THEREFOR	RE WHILE LISTED AS SERVICE	**	SALES TAX	1.	1/2
COST	OF OP	ERATIO	ON FOR WHI	CH NO SEPARATE CHARGE IS PLEASE NOTE	F	SERVICES		100

MECHANIC_

Ruffles Co.

P. O. DRAWER K
FAIRHOPE, ALABAMA 36532

1	100		٠.	
DEPT				

ADDI				4 2		Supplement of the second	<u> </u>
NATU	IRE OF	WOR	K (Bar	and dent la till de			***************************************
			1				
TAKE	RET'D	USED	STOCK NO.	ITEM	NO.	UNIT PRICE	PRICE
$-\!\!\!/$:		4 Cold & Ch. Pela.		1.75	1 75
		·		4 "Clas to Beach		3.50	3.57
To the second				410 Wall to But		2.77	4 26
				4"CW 4 Bod		7.10	4/ 5/
/				4000 450 St. St.		7.11	7.10
/		N _e		4"Ch data (1/10)		7.2	
1				W. 6. W. C. h		100 Same 100	
			······································	And the state of t		1 62	1.02
·····					_		
			····				
DUE TO	THE NA	TURE	OF THIS BUSI	MESS IT IS NECESSARY THAT MENT FOR MEN WHOSE SER- POSTED		MATERIAL	3030
VICES	ARE REI	NDERE:	D-THEREFOR LY IS FOR SE	E WHILE LISTED AS SERVICE	:	SALES TAX	91
COST MADE.	OF OPE	RATI	ON FOR WHI	CH NO SEPARATE CHARGE IS PLEASE NOTE		[-	48. 88

RUFFLES COMPANY

		P. O. DRA	WERK - FAIRHOPE, A	LABAMA 36532	
	PLUMBING /-	HEATING -	FLECTRICAL 7	AIR CONDITIONING	- L. P. GAS
Æ.	Jan Marie		LANGERAL	DATE	7-71-66

NAM

E	RET'D		0000000		Same College of warrant		
	701	USED	STOCK NO.	17EM	CODE	PI	RICE
- - 2	300			4.06/Plac	.55	<u> 16</u>	12
	1			4 1 4 10 apt	1.90	3.	1
	2			4 - The Band	and a property	hof a	Ţ
	7			4 - to Bank	210	4	1
-	Light		art	Cament	.75	<u></u>	
1	121		シ 	4 2 6 12 22	. 5	6	1
	3			4 J.C to Bland	1.40		1
1							1 340
1							-
†							╁
\top							-
1							+
†-				- CREDIT MEMO			┼
+							╀
+						*****	_
							_
				POSTED		37	1

LABOR HELPERS

TOTAL LABOR TOTAL CHARGES STATE OF ALARAM Comments to be the second of the second

Ruffles Company, Issemporates files this stationers in writing, verified by the oath of the R. Ruffles, dr., who has personal knowledge of the facts herein set forth;

That said Burries Company, Interporaçed claims a lien upon the following property, alterior in reinforce, maintains County, Alebama, to-wit:

Lot Two Pairwood Subdivision Familes One

This lies is allimad, suppresely was coverelly, as to both the buildines end improvements thereon, and the sold lend.

That sold liter is claimed to acture an impobalties of \$354.59 with interest, from to-with Pinyt day of Lugwah, 1966 for:

> Labor and Materials furnish for improvements to said land and building

The same of the awarene proved over of the safe property is Toul J. Morallinia

Dalling Jonesty, Indopposited

AND THE STATE OF T

WALL OF ALLADARING AMERICAN COLUMN

t many their mile histories was think and

av manaki e zazaza zgantan ibak

and the are not seen and appear the second s Section of the sectio

P. O. DRAWER K

FAIRHOPE, ALABAMA 36532

DEPT.

NAM	E 7/	Z.	PLOMI	BING - HEATING -	ELECTRICAL	- AIR CONE		G L - 5 -6	6	
	RESS		4	03 Fairwood	73. July				- <i>17</i> -	
NATU	JRE OF	WOR	K Chec	k out send	lene -	ice long	pord	y 12	<u> </u>	· ·
TAKE	RET'D	USED	STOCK NO.		ITEM		NO.	UNIT PRICE	PRICE	<u> </u>
	 			**************************************	,					

			· · · · · · · · · · · · · · · · · · ·							
					3					
······································					***************************************					
	<u> </u>									
					······································					
	 		<u></u>		-					
	<u> </u>					***************************************				
DUE I	O THE N	TRUCK	OF THIS BUS	INESS IT IS NECESSARY THAT MENT FOR MEN WHOSE SER-	POSTED			MATERIAL		_
VICES	ARE RI	ENDERE	D-THEREFOR	RE WHILE LISTED AS SERVICE ERVICES, EQUIPMENT AND	`			SALES TAX		
COST	OF OP	ERATI	ON FOR WHI	CH NO SEPARATE CHARGE IS	PLEA	SE NOTE -		SERVICES	10	28
	HANK	_			784		TOTAL	L CHARGES		4.4
1VI = C			NTH SERVIC	E CHARGE WILL BE ADDED	TO ALL ACCOUN	TS AFTER 30 DAY		<u>1</u>	ING	

P. O. DRAWER K

FAIRHOPE, ALABAMA 36532

					1	<u> </u>		
TAKE	RET'D	USED	STOCK NO.	Mati	NO.	UNIT PRICE	PRIC	CE
			манем	1				
				Vumpout seste tank				
				1z Toe Lughes			25	00
								-

* ·*····			***************************************					
-	ļ							

	<u> </u>							
				INESS IT IS NECESSARY THAT		MATERIAL		
VICES	ARE RE	NDERE	D-THEREFO	PMENT FOR MEN WHOSE SER- RE WHILE LISTED AS SERVICE ERVICES, EQUIPMENT AND		SALES TAX		
	OF OP			ICH NO SEPARATE CHARGE IS PLEASE NOTE	&	SERVICES		
		_		785	w/ TOTA:	CHARGES	15	00
IVIEC	HANIC		VTH SERVE	CE CHARGE WILL BE ADDED TO ALL ACCOUNTS AFTER 20 D.			100	00

MECHANIC_

P. O. DRAWER K

FAIRHOPE, ALABAMA 36532

TOTAL CHARGES

NAIL	JRE OF	WUR	K Jeep	an fer	ner l		Z Se	2 75	Lenk		
TAKE	RET'D	USED	STOCK NO.	12-		ITEM			NO.	UNIT PRICE	PRICE
***************************************	1			Camer	rb						30
											
										777111111111111111111111111111111111111	
······											
···· ·	ļ					······································					

	<u> </u>					**********************************		***************************************			

				-			**************************************				
			···								
	-							• ••••••••			
		i .		1							
WE F	URNISH	TRUCKS	5 AND EQUI	SINESS IT IS NE	N WHOSE SE	R. PC	STED			MATERIAL	30
THE C	HARGE	ACTUAL	LY IS FOR S	RE WHILE LISTI ERVICES, EQU	JIPMENT AN	D C				SALES TAX	0/
COST		ERATI	ON FOR WH	ICH NO SEPARA	TE CHARGE	ıs	- PLEA	SE NOTE		SERVICES	マルクマ

P. O. DRAWER K

FAIRHOPE, ALABAMA 36532

DEPT.	

1 1		
		-

MECHANIC.

Ruffles Co.

P. O. DRAWER K

FAIRHOPE, ALABAMA 36532

DEPT.

			PLUM	BING -			LECTR	ICAL -	- AIR C		ONINC	G /// 7 ~		, ,
NAME ADDR		r a	ul_	///	Cull	wigL	,			DATE		4/2/3	/6	6
	RE OF	WOR	K /	?	1 /	<i>/</i>		77						
IVAIU		1101		nice		maes.		<u> </u>		15 (15)				
TAKE	RET'D	USED	STOCK NO.			[1]	EM				NO.	UNIT PRICE	PRI	CE
44				4"+	CH	e pe	4 .					.50	22	00
1				4"+	CX		L.					1,40	1,	40
				411+	CH	11					***************************************	1.45	/.	45
2				4"+0	シを	Man.	Q,					1.40	7	80
2#	=			A Do	kum							.49		98
14#	ξ			Caman	<i>t</i>							:04		156
/				nell	15	# 7	e Of					3.00	3,	00
1				4"0	WX	1/11/	10	all	· /			1.90	1.	91
j			W	4101	1 4	4/1/	27	- /				1.25		75
/				Can 1	arlas	1	1 ann	7-18				,75		25
80	/			4"0	111. 1	2/2-1		08.				,55	44	00
/				411 6	11) X	411-	40	1	lo.			1.90	1.	91
														
					der hat the state of the state								·····	-
						······								
DUE TO	THE N	ATURE	OF THIS BUS	SINESS IT IS N	ECESSARY T	TAR	200					MATERIAL	82	119
WE FU VICES	rnish ' Are re	TRUCKS NDERE	S AND EQUIP D-THEREFO	PMENT FOR M RE WHILE LIS	EN WHOSE TED AS SER	SER- VICE &	POST	ED			_		00	30
COST	ARGE A	CTUAL ERATI	LY IS FOR S ON FOR WH	ERVICES, ECICH NO SEPA	QUIPMENT RATE CHARC	AND VE IS		D EEAC	E NOTE			SALES TAX	1.8	12
MADE.						سوراز ورها	-	R F F W 2	T MATERIAL			SERVICES	100.	12

P. O. DRAWER K

FAIRHOPE, ALABAMA 36532

BEBY	•		
0271		 	 *******

TAKE	RET'D	USED	STOCK NO.	ITEM	NO.	UNIT PRICE	PRICE

						·	
	- Control of the Cont						
							
	ļ						
					<u> </u>		
WE F	URNISH	TRUCKS	AND EQUIP	NESS IT IS NECESSARY THAT AENT FOR MEN WHOSE SER- POSTED		MATERIAL	
THE C	HARGE .	<i>\CTUAL</i>	LY IS FOR SE	E WHILE LISTED AS SERVICE RVICES, EQUIPMENT AND	s	ALES TAX	
COST		ERATI	ON FOR WHIC	TH NO SEPARATE CHARGE IS PLEASE	NOTE	SERVICES	2931
0.4 E-C	HANK	•		789		CHARGES	
141 C. C			NTH SERVIC	E CHARGE WILL BE ADDED TO ALL ACCOUNTS AF			NC

MADE.

MECHANIC.

P. O. DRAWER K

FAIRHOPE, ALABAMA 36532

DEPT.	
-------	--

TOTAL CHARGES

ADDF NATU	RE OF	WOR	K					
TAKE	RET'D	USED	STOCK NO.	ITEM	NO.	UNIT PRICE	PRIC	E
				2-816 Puller		2.50	2.	50
/				Motor Rewind sol		17.35	17.	35
4				motor Mount roller		.35		40
2				fill valve duphasm		1)5	1.	50
/				2-11124 V Belt		1.95	_/.	95
/				2-11/25 U Belt		2.05	2.	05
		To the state of th						
							····	
DUE T	O THE N	ATURE	OF THIS BUS	SINESS IT IS NECESSARY THAT PMENT FOR MEN WHOSE SER- POSTED		MATERIAL	36	75
VICES	ARE RI	ENDERE	D-THEREFO	PMENT FOR MEN WHOSE SER- RE WHILE LISTED AS SERVICE ERVICES, EQUIPMENT AND		SALES TAX	1.	Ma
COST	OF OF	ERATI	ON FOR WH	ICH NO SEPARATE CHARGE IS PLEASE NOTE	à	SERVICES		<u> </u>

MECHANIC.

Auffles Co.

NCORPORATED P. O. DRAWER K

FAIRHOPE, ALABAMA 36532

DEPT.

AIR CONDITIONING

NAME			Paul	Mc Cullough	DATE	4-27	-66
ADDR			A	The state of the s			
NATU	RE OF	WOR	K Con	pled Sewer line to City or	Lee		
						Luur seise	
TAKE	RET'D	USED	STOCK NO.	ITEM	NO.	UNIT PRICE	PRICE
\bot				4"CW X Ch alig.		1.75	175
				4"CW 4 Bend		3.50	3.50
2				4"CW to Bend		2.10	4.20
2				4"CW To Bend		2.10	4.20
/			<u> </u>	4"CW 450 St. Sell		2.10	2.10
/				4"CW 11000		3:50	3.50
			4100	4" CW Cos		1.05	1.05
							
		-					
DUE T	OTHEN	ATURE	of this bus	INESS IT IS NECESSARY THAT PMENT FOR MEN WHOSE SER- POSTED		MATERIAL	20.30
VICES	ARE RE	ENDERE	D-THEREFOR	RE WHILE LISTED AS SERVICE		SALES TAX	81
COST	OF OP	ACTUAL ERATI	LY IS FOR SI ON FOR WH	ERVICES, EQUIPMENT AND ICH NO SEPARATE CHARGE IS PLEASE NOTI	<u>-</u>	1.	48.88
MADE.				The second secon	- I	SERVICES	T1 111

RUFFLES COMPANY P. O. DRAWER K - FAIRHOPE, ALABAMA 36532 PLUMBING /-HEATING - ELECTRICAL 7 AIR CONDITIONING - L. P. GAS NAME Faul ADDRESS _____ NATURE OF WORK RET'D USED STOCK NO. 1 T E M PRICE

	CREDIT MEMO		
			3769
	LABOR MECHANICS LABOR HELPERS	SALES TAX	151
MECHANIC		TOTAL LABOR	39 20

STATE OF ANABAMA COUNTY OF PARDNIN

Ruffles Company, Incorporated files this statement in writing, verified by the oath of Wm. R. Ruffles, Jr., who has personal knowledge of the facts herein set forth;

upon the following property, situated in Fairhone, Baldwin, County, Alabama, to-wit:

Lot Two Pairwood Subdivision Number One

This lien is claimed, separately and severally, as to both the buildings and improvements thereon, and the said land.

That said lien is claimed to secure an indebtedness of \$354.59 with interest, from to-wit First day of August, 1966 for:

Labor and Materials furnish for improvements to said land and building

The name of the owner of property is Paul J. Medullough.

Ruffles Company, Incorporated

By get Rolling to the Rolling of the

the county of the foresting statement of lien, and that the same are true and correct to the best of his knowledge on belief.

Subscribed and sworn to before me on this the A day of

STATE OF ALABAMA, BALDVIN COUNTY

i earlies that this transmiss was filed as

AUG 8 1965 26

SOROTRY ALLEGRI - NOTARY PUBLIC PALDW R COUNTY

and they no tex was connected. Recorded in Eff Tolerance Book Thomas Deline Judge of Prologies

783

SA CITAL SA

NOV 6 1967

MAYLOR WILKINS

720, 1821

Ruffles Company

Paul Mª Cullough.

The state of the s

NOV 1967

Et Richarby-

STATE OF ALABAMA, COUNTY OF BALDWIN.

CIRCUIT COURT,	BALDWIN	COUNTY,
	TI	CRM,1967.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon PAUL McCULLOUGH 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 PAUL McCULLOUGH, Defendant, by RUFFLES COMPANY, a Corporation, Plaintiff.

WITNESS my hand this 4 day of 00 t, 1967.

Celient Monch

RUFFLES COMPANY,	a Corporation,	Ŏ	
	Plaintiff,	Ŏ	IN THE CIRCUIT COURT OF
Vs.		Ŏ	BALDWIN COUNTY, ALABAMA,
PAUL McCULLOUGH,		Ŏ	AT LAW.
	Defendant.	Ŏ	

COMPLAINT

Count I.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FIFTY FOUR AND 59/100 (\$354.59) DOLLARS for work and labor done by the Plaintiff at the request of the Defendant on a building or improvements on the following described property, to-wit:

Lot Two Fairwood Subdivision Number One, Subdivision of Fairhope, Baldwin County, Alabama.

which said indebtedness accrued on, to-wit, the 1st day of August, 1967, and is now due and unpaid.

The Plaintiff alleges that the above described property was the property of PAUL Mccullough, that the work or labor was done or performed on said building or improvements on said land under, and by virtue of, a contract with the said PAUL Mccullough, the owner or proprietor thereof, that within six months after said indebtedness had matured, on, to-wit,

Cont'd, Summons & Complaint: Ruffles vs. McCullough.

the 8th day of August, 1966, the Plaintiff did file in the Office of the Judge of Probate of the County wherein said land is situated, a verified statement as required by law, a copy of which is hereby attached and made a part hereof, and marked, "Exhibit A".

WHEREFORE, the Plaintiff claims a lien for said amount upon said land and buildings and improvements situated thereon.

Count II.

The Plaintiff claims of the Defendant THREE HUNDRED FIFTY FOUR AND 59/100 (\$354.59) DOLLARS due from him by account, on, to-wit, the 1st day of August, 1967, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

E. G. RICKARBY, Attorney for the Plaintiff.

Paul McCullough's address is: 506 Douglas Avenue, Brewton, Alabama.

14 1967 National Page 1967