

JEFFREYS STEEL CO., INC.  
an Alabama corporation,

Plaintiff,

VS.

GEORGE HAVEL d/b/a  
FOLEY WELDING AND MACHINE CO., )

Defendant,

) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA

) AT LAW

) CASE NO. 8139

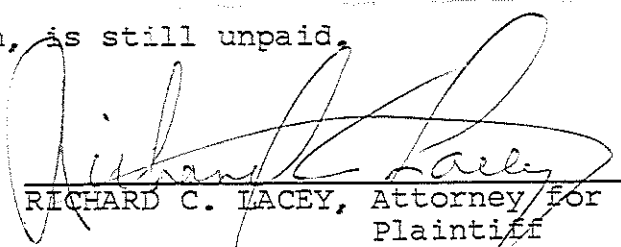
BILL OF COMPLAINT

I

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED TWENTY-TWO and 54/100 DOLLARS (\$422.54), due from him on account, to-wit; the 28th day of April, 1967, which sum of money with interest thereon is still unpaid.

II

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED TWENTY-TWO and 54/100 DOLLARS (\$422.54), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit; the 28th day of April, 1967, which sum of money with interest thereon, is still unpaid.

  
RICHARD C. LACEY, Attorney for  
Plaintiff

The Defendant resides at Foley, Alabama.

There is attached hereto and made a part hereof Exhibit "A" a statement of accounts, under oath executed by Leon Jeffreys as President of Jeffreys Steel Co., Inc.

**FILED**

MAY 13 1968

**ALICE J. DUCK**

CLERK  
REGISTER

P. O. DRAWER A-J

**RICHARD C. LACEY**

TELEPHONE 923-2373

ATTORNEY AT LAW  
FAIRHOPE, ALABAMA 36532

August 29, 1968

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

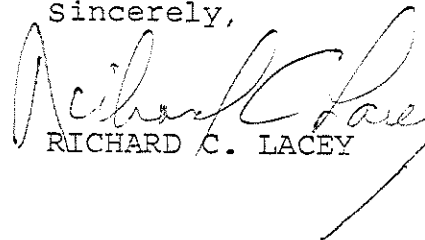
RE: Jeffreys Steel vs.  
Foley Welding & Machine Co.

Dear Mrs. Duck:

*M-8137*

Please dismiss subject case as settled between the parties. Please send me the cost bill and I will send you a check.

Sincerely,

  
RICHARD C. LACEY

RCL/dt

P. O. DRAWER A-J

**RICHARD C. LACEY**

TELEPHONE 928-2373

ATTORNEY AT LAW  
FAIRHOPE, ALABAMA 36532

May 6, 1968

Mrs. Alice J. Duck  
Circuit Clerk  
Circuit Court  
Bay Minette, Alabama 36509

Dear Mrs. Duck:

RE: Jeffreys Steel Co. vs.  
George Havel d/b/a Foley  
Welding and Machine Co.

8139

Please give this Bill of Complaint and Summons  
to Sheriff Wilkins for execution.

Sincerely,

*Dorothy Turner for Richard Lacey*

RICHARD C. LACEY  
BY DOROTHY TURNER,  
Secretary

RCL/āt  
Encls.

COUNTY OF Mobile  
STATE OF Alabama

Be it remembered, that on this 24 day of October  
A. D., 1967, personally appeared before me, the undersigned authority,  
Leon Jeffreys known to me  
who being duly sworn, upon his oath stated that he is President  
of Jeffreys Steel Co., Inc.  
{ a corporation organized and doing business under the laws of the State of Alabama  
{ and has been duly authorized by said corporation to make this affidavit  
{ a partnership composed of \_\_\_\_\_  
a sole trader doing business as \_\_\_\_\_  
and that as such he makes this affidavit; that he is familiar with the books and business of  
said Jeffreys Steel Co. Inc.; that the attached account against  
Foley Welding & Machine Co. of Foley, Alabama  
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-  
posing the said account were sold and delivered to said Foley Machine & Welding Co.  
at { its } special instance and request that credit has been duly given for all payments and  
{ ~~their~~ }  
{ ~~this~~ }  
just and lawful offsets to which said account is entitled as thereon stated, and that the balance  
thereof, amounting to the sum of Four Hundred Twenty-Two and 54/100 Dollars  
(\$ 422.54) with interest from March 28, 19 67 is justly due and  
remains unpaid.

Leon Jeffreys X

I hereby certify under my official seal that I am authorized as a Notary Public to  
administer oaths under the laws of the State of Alabama  
and that the foregoing was subscribed and sworn to before me on the day and year  
first above stated.

Gene E. Whitney  
Notary Public  
My Commission Expires 10-14-71

## STATEMENT

## JEFFREYS STEEL COMPANY, INC.

P. O. Box 5425      Phone (205) 438-5612  
661 Pillans Street  
MOBILE, ALABAMA 36605

9-30-67

Foley Welding &amp; Machine

211 Cypress St.

Foley, Alabama 36535

DATE	NUMBER	DEBIT	CREDIT	BALANCE
1-23-67	182	10.18		
1-25-67	212	416.80		426.98
2-23-67	433	262.00		
2-23-67	453	3.56		
2-28-67			250.00	442.54
5-29-67			20.00	422.54



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 George Havel d/b/a Foley Welding and  
Machine 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.....George  
Havel d/b/a Foley Welding and Machine Co......, Defendant.....

by Jeffreys Steel Co., Inc., an Alabama corporation  
....., Plaintiff.....

Witness my hand this.....13.....day of.....May.....1968.....  
Charles J. Huck....., Clerk

No. 8139

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Jeffrey Steel Co. Inc.  
an Ala. corp.

Plaintiffs

vs.

George Havel d/b/a  
J. L. Helling & Machine Co.

Defendants

SUMMONS AND COMPLAINT

Filed **FILED** 19.....

MAY 13 1968

Clerk

**ALICE J. DUCK**

CLERK  
REGISTER

Richard C. Lacey  
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

MAY 13 1968

19.....

**TAYLOR WAKINS**

Sheriff

I have executed this summons

this 14th May 19.. 68  
by leaving a copy with

George Havel

TAYLOR WAKINS, SHERIFF OF BALDWIN

COUNTY, ALABAMA, CLAIM \$1.50 EACH

FOR SERVING 1 PROCESS(ES) AND

TRAVEL EXPENSE ON EACH OF \$ 7.20

PROCESS(ES) OR A TOTAL OF \$ 8.20

Taylor Wakins Sheriff  
J. M. Eastman Deputy Sheriff  
Goley, Ala.