

P. O. DRAWER A-J

RICHARD C. LACEY

TELEPHONE 928-2373

ATTORNEY AT LAW

FAIRHOPE, ALABAMA 36532

September 24, 1968

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

8344

RE: Coleman Marine & Hardware, Ltd.
vs. Fred Lipscomb

Lucy A. Allison vs. John O. Allison

Dear Mrs. Duck:

Please find enclosed Bill of Complaint on Coleman
Marine and Hardware and place this to be filed along with
the answer to the Bill of Complaint ~~on Allison vs. Allison~~

sincerely,

Richard C. Lacey
RICHARD C. LACEY

RCL/dt
Encls.

COLEMAN MARINE & HARDWARE, LTD.))	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW
FRED LIPSCOMB)	Case No. 8344
Defendant)	

Now comes the defendant and for answer to the complaint in this cause heretofore filed says to each count thereof separate and severally:

ONE

That he is not guilty of the matters alleged therein.

Arthur C. Epperson
 Arthur C. Epperson
 Attorney for the Defendant

THE DEFENDANT DEMANDS A
 TRIAL BY JURY.

Arthur C. Epperson
 Attorney for the Defendant

I hereby certify that I have this date mailed postage prepaid by regular mail a copy of the foregoing pleading to Richard C. Lacey, Attorney for the Plaintiff, properly addressed to his office in Fairhope, Alabama.

This the 12th day of December, 1968.

Arthur C. Epperson
 Arthur C. Epperson

FILED

DEC 14 1968

ALICE J. DUCK CLERK
 REGISTER

COLEMAN MARINE & HARDWARE, LTD.,) IN THE CIRCUIT COURT OF
a Co-Partnership composed of)
JAMES P. COLEMAN and JOHN RAY) BALDWIN COUNTY, ALABAMA
NELSON,)

Plaintiff)

AT LAW

VS:)

CASE NO. 8344

FRED LIPSCOMB,)

Defendant)

BILL OF COMPLAINT

I

The Plaintiff claims of the Defendant THREE HUNDRED EIGHTEEN AND 85/100 DOLLARS (\$318.85), due from him on account, to-wit: the 6th day of Sept, 1966, which sum of money with the interest thereon, is still unpaid.

II

The Plaintiff claims of the Defendant THREE HUNDRED EIGHTEEN AND 85/100 DOLLARS (\$318.85), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit: the 6th day of Sept, 1966,, 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 JAMES P. COLEMAN, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 6th day of Sept, 1966, and due at present.

The Defendant resides at Foley, Alabama.

FILED

SEP 26 1968

ALICE J. DUCK CLERK
REGISTER

STATEMENT
COLEMAN MARINE & HARDWARE, LTD.
POLY, ALABAMA

BOAT LITTLE WIND

Boat Lagoon

DATE	DETAIL	DEBITS	CREDITS	BALANCE
9-7	Balance			74.31
17	2025		16.34	57.97
	1-1-67			
3-20	1470 - Helms Net for Payment	30.53		30.53
	Correct Balance			88.50
8-1	4239		30.53	57.97

1-15-68
Please handle collection
on these pp

VOL

61 PAGE 451

PAY LAST AMT. THIS CHECK CANCELS

A F F A D A V I T

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared JAMES P. COLEMAN, ~~and~~ ^{JPC} who after being first duly sworn, doth depose and say as follows: My name is JAMES P. COLEMAN, ~~and~~ ^{JPC} I am the Manager-Owner of COLEMAN MARINE & HDW., LTD.; Fred Lipscomb purchased materials and supplied over a period of time from Coleman Marine & Hdw., Ltd. and has an unpaid balance due Coleman Marine & Hdw., Ltd. in the amount of THREE HUNDRED EIGHTEEN and 85/100 DOLLARS (\$318.85); that there are no said off sets, counter claims or amounts owing Fred Lipscomb by Coleman Marine & Hdw., Ltd.; that attached hereto and made a part hereof is a statement of account showing the dates of purchases and credits on behalf of Fred Lipscomb which said statement is true and correct.

DATED this the 30 day of August, 1968.

COLEMAN MARINE & HDW., LTD.

By: James P. Coleman
JAMES P. COLEMAN, ~~and~~ ^{JPC}

SWORN TO and subscribed

before me on this the

30th day of August, 1968.

Clarence L. Swann
NOTARY PUBLIC
My Commission Expires 4/5/71.

FILED

SEP 26 1968

ALICE J. DUCK

CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8344

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonFRED LIPSCOMB.....

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.....

.....FRED LIPSCOMB..... Defendant.....

byCOLEMAN MARINE & HARDWARE, LTD., a co-Partnership composed of JAMES P.

.....COLEMAN & JOHN RAY NELSON..... Plaintiff.....

Witness my hand this.....26th.....day of.....September.....1968.....

.....Alice J. Luck.....Clerk

24-11-20-68

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

COLEMAN MARINE & HARDWARE, LTD.,
a Co-Partnership composed of
JAMES P. COLEMAN & JOHN RAY NELSON

Plaintiffs

vs.

FRED LIPSCOMB

Vernant Park

Defendants

SUMMONS AND COMPLAINT

965-2683

Filed September 26, 19 68

Alice J. Duck Clerk

Richard C. Lacey

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

SEP 26 1968
Received In Office

TAYLOR WILKINS

19.....

Sheriff

I have executed this summons

this 20th of Nov 19 68

by leaving a copy with

Fred Lipscomb

Sheriff claims 8 1/2 miles at

Ten Cents per mile Total \$ 8.46

TAYLOR WILKINS Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins

Sheriff

Jim E. Thomas

Deputy Sheriff

Vernant Park