MOORE-HANDLEY, INC., a corporation.)	IN THE CIRCUIT COURT OF
a corporation,)	BALDWIN COUNTY, ALABAMA
Plaintiff,	``	
vs.	,	AT LAW
AC-CALL AND CAMBBELL CONTRACTORS		
McCAW AND CAMPBELL CONTRACTORS, INC., a corporation,)	
Defendants.)	CASE NO. Sur 25

COUNT ONE

Plaintiff claims of the defendants the sum of to-wit, ONE THOUSAND THREE HUNDRED NINETEEN AND 37/100 (\$1,319.37) DOLLARS due from them by account between the defendants and Moore-Handley, Inc., a corporation, during the period to-wit the 25th day of July, 1967, to the 28th day of August, 1967, inclusive, which sum of money with the interest thereon, is still unpaid.

COUNT TWO

Plaintiff claims of the defendants the sum of to-wit, ONE THOUSAND THREE HUNDRED NINETEEN AND 37/100 (\$1,319.37) DOLLARS on account stated between the defendants and Moore-Handley, Inc., a corporation, on to-wit the 31st day of January, 1968, which sum of money with the interest thereon, is still unpaid.

COUNT THREE

Plaintiff claims of the defendants the sum of to-wit, ONE THOUSAND THREE HUNDRED NINETEEN AND 37/100 (\$1,319.37) DOLLARS for merchandise, goods, and chattels sdd by Moore-Handley, Inc., a corporation, during the period to-wit the 25th day of July, 1967, to the 28th day of August, 1967, inclusive, which sum of money with the interest thereon, is still unpaid.

FILED

LYONS, PIPES AND COOK Attorneys for Plaintiff

MOA 12 JACO

AND J. BEEN REGISTER

By: Walter M. Cook
Walter M. Cook

An itemized verified statement of account sued upon in Counts
One and Two is hereto attached and made a part hereof.

Walter M. Cook
Walter M. Cook

STATE OF ALABAMA COUNTY OF MOBILE

Before me, the undersigned authority in and for aforesaid county and state, who as a notary public
under my seal of office, which seal of office is hereto attached, personally appeared W. E. Pettis
known to me, who being duly sworn, upon his oath stated he is
Operations Manager of Moore-Handley, Inc.
a corporation, organized and doing business under the laws of Alabama,
that as such he makes this affidavit; that he is familiar with the books and business of Moore-Handley,
Inc. that
the attached account against McCaw and Campbell Contractors, Inc.
is just and correct within the knowledge of this affiant; that he has authority to make this affidavit and that
he has personal knowledge of the matters contained herein; that the items thereon stated and composing
the said account were sold and delivered to the said McCaw and Campbell Contractors, Inc.
, 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 said account is entitled as One Thousand Three Hundred
thereon stated and that the balance thereon amounting to the sum of Nineteen and 37/100
Dollars (\$1,319.37) with interest from 7-25 , 19 67
is just due and remains unpaid.
M. E. Dillis
MR. W. E. PETTIS, Operations Manager
Sworn to, subscribed, acknowledged, signed and sealed before me, as a notary public under my seal of
office, with my seal hereto affixed on this the 224 day of March, 1968.
Lenda A. Keller
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

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July 28, 1967, Reg. No. 14G2826	823.05
August 28, 1967, Reg. No. 14H342	209.17
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Less cash from previous check	4.43
BALANCE DUE	\$ 1,319.37

STATE	OF	ALABAMA
Rai	ldınin	Countu

Circuit Court, Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

McCaw and Campbell Contractors, Inc., a corp

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......

McCaw and Campbell Contractors, Inc., a corp Defendant.......

by Moore-Handley, Inc., a corp

Witness my hand this 13 day of November 19.68.

Ascent Buch Cler

VOL 61 PAGE 524

IN LA TRING 1 June 60	
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	Lyons, Pipes & Cook
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Defendant lives at	
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LYONS, PIPES & COOK

ATTORNEYS AT LAW

2510 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

JOSEPH H.LYONS (1900-1957)

36601

AREA CODE 205 P.O. DRAWER 2525

SAM W. PIPES WALTER M. COOK GORDON B. KAHN IRWIN W. COLEMAN, JR. G. SAGE LYONS AUGUSTINE MEAHER, III JAMES B. KIERCE, JR. WESLEY PIPES

November 11, 1968

CERTIFIED MAIL RETURN RECEIPT REQUESTED.

Mrs. Alice Duck Clerk, Circuit Court Baldwin County Courthouse Bay Minette, Alabama

Re:

Moore-Handley, Inc. vs. McCaw and Campbell

Contractors, Inc.

ayustini Meaher ____

Dear Mrs. Duck:

We enclose our complaint in the above cause and request that it be filed in your Court. As far as we know the defendant conducts business at 309 Hand Avenue in Bay Minette.

Yours very truly,

LYONS, PIPES AND COOK

Augustine Meaher, III

AM/bn

Enclosures