

P. O. DRAWER A-J

RICHARD C. LACEY

TELEPHONE 923-2373

ATTORNEY AT LAW

FAIRHOPE, ALABAMA 36532

May 15, 1969

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

8704

RE: Coleman Marine & Hardware
vs. Holly D. Nelson & Beryl Nelson

Dear Mrs. Duck:

Enclosed please find subject Bill of Complaint and
file for service. Thank you.

Sincerely,

Richard C. Lacey
RICHARD C. LACEY

H

RCL/dt
encls.

COLEMAN MARINE & HARDWARE, LTD.
a limited partnership,

Plaintiff

VS:

HOLLY D. NELSON and
BERYL NELSON, jointly and
separately,

Defendants

)
) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
)
) AT LAW

CASE NO.

8204

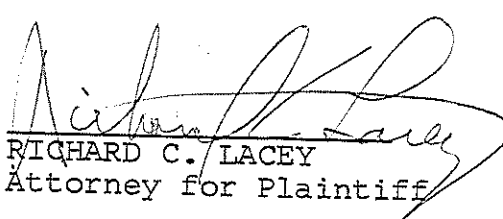
BILL OF COMPLAINT

I

The Plaintiff claims of the Defendant TWO HUNDRED NINETY FOUR and 04/100 DOLLARS (\$294.04), due from him on account, to-wit; the 12th day of March, 1968, which sum of money with the interest thereon is still unpaid.

II

The Plaintiff claims of the Defendant TWO HUNDRED NINETY FOUR and 04/100 DOLLARS (\$294.04), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit: the 12th day of March, 1968, 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 hereto, 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 12th day of March, 1968, and due at present.

Defendant resides at
Foley, Alabama (Rt 2)

FILED

MAY 16 1969

ALICE J. DUCK

CLERK
REGISTER

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 HOLLY D. NELSON and BURL NELSON

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..... HOLLY D.
NELSON and BURL NELSON
....., Defendant.....

by COLEMAN MARINE & HARDWARE, LTD.

....., Plaintiff.....

Witness my hand this..... 16 day of May 1969

..... Alice J. Luck Clerk

24-1-23-69

No. 8704

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

*Coleman Marine &
Hardware Ltd.*
Plaintiffs

vs.

*Holly H. Nelson &
Beryl Nelson*
Defendants

SUMMONS AND COMPLAINT

Filed *5-16* 19*69*

Alice J. Lusk Clerk

Richard C. Roney
Plaintiff's Attorney

Defendant's Attorney

RECEIVED
Defendant's Office

MAY 16 1969

Received in Office

..... 19.....

....., Sheriff

I have executed this summons

this *May 13* 19*69*

by leaving a copy with

*Holly H. Nelson
Beryl Nelson*

Sheriff claims *17.25* miles at

Ten Cents per mile Total \$ *2.60*

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Joseph C. Childress Sheriff
Childress Deputy Sheriff

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