

15711

STATE OF ALABAMA
BALDWIN COUNTY

You are hereby commanded to summon HELEN ANDRESS, to appear and plead, answer or demur, within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in equity, by J. V. PHILLIPS, as Plaintiff, and against HELEN ANDRESS, as Defendant.

WITNESS my hand this 19th day of July, 1950.

Alice L. Smith
Register

J. V. PHILLIPS
Plaintiff
Vs
HELEN ANDRESS
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Plaintiff claims of the Defendant One Thousand (\$1,000.00) Dollars damages for the breach of an oral agreement entered into by her on to-wit, December 17th, 1949, in substance, as follows:

AGREEMENT BETWEEN HELEN ANDRESS AND J. V. PHILLIPS

Helen Andress agrees to furnish a certain tract of land, seed, potatoes, fertilizer and help cut potatoes. J. V. Phillips agrees to do all plowing, planting, digging, spraying and hauling to Foley Market and clearing of land. Potatoes or money from potatoes are divided one half each.

Melons or cucumbers are to be raised one half each. After spring crops are harvested we are to plant beans.

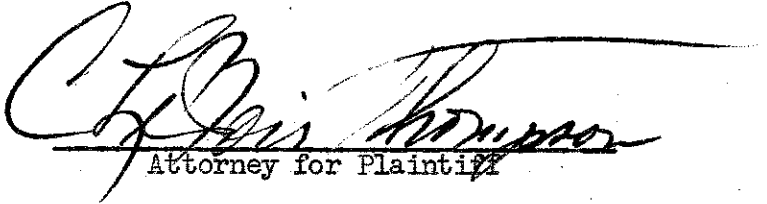
Helen Andress is to furnish fifteen acres, bean seed and spray poison. J. V. Phillips is to do all plowing, planting, spraying and cutting of beans.

J. V. Phillips is to have all hay from beans and one half of money from beans and Helen Andress one half of money received from beans.

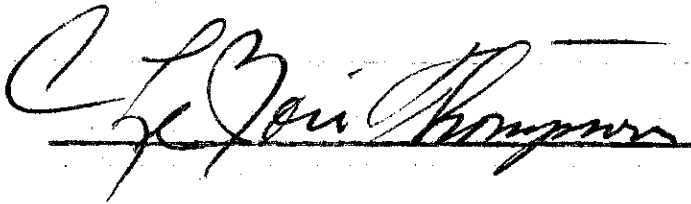
In case either Helen Andress or J. V. Phillips should decide after this year they do not care to farm this land they are to

give each other the first chance to work the land the next year.

Plaintiff says that he complied with all of the provisions on his part permitted by the Defendant. That the Defendant interfered with the Plaintiff's operation and denied Plaintiff access to the property after he had expended sums of money, great labor and considerable time in clearing and preparing the ground in accordance with the agreement and that Plaintiff was in addition thereto denied all profits which should have accrued from the completed contract; hence this suit.


Attorney for Plaintiff

Plaintiff demands trial by jury.



J. V. PHILLIPS,

Plaintiff

VS:

HELEN ANDRESS,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW - NO. 2511

DEMURRER

Comes the Defendant in the above styled cause and files this her demurrer to the Complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That the Summons states that a Bill of Complaint has been filed in the Circuit Court of Baldwin County, Alabama, in equity, whereas the pleading states that it is in the Circuit Court of Baldwin County, Alabama, at Law.
2. That the pleading is vague and indefinite for that the Complaint does not state a cause of action.

Wm. H. Chisler
Attorney for Defendant

J. V. PHILLIPS,

Plaintiff

VS

HELEN ANDRESS,

Defendant

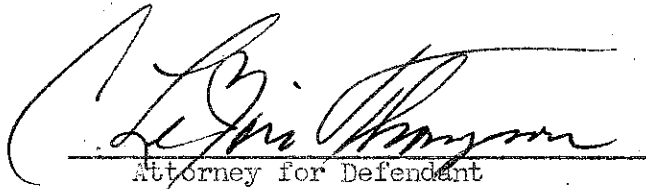
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW - No. 2511

MOTION

Comes the Plaintiff in the above styled cause and moves the court to transfer said cause to the law side of the court as said forth in the Complaint.


Attorney for Defendant

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA - LAW SIDE

J. V. PHILLIPS,
Plaintiff
vs.
HELEN ANDRESS,
Defendant

Now comes A. B. Miller, Attorney at law, and files this
his appearance in the above styled cause as Attorney for the
Plaintiff in said cause.

A. B. Miller
Attorney for Plaintiff

PARNELL-MARTIN-GUNN SUPPLY
COMPANY, A Corporation,

Plaintiff,

vs.

WALTER S. ALEXANDER, individually,
and doing business as ALEXANDER
PLUMBING COMPANY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

MOTION FOR JUDGMENT BY DEFAULT

Now comes the Plaintiff in the above styled cause, by its Attorneys, and moves the court to render a judgment by default in favor of the Plaintiff and against the Defendant for the amount claimed in Plaintiff's complaint that has heretofore been filed in this cause.

A copy of said summons and complaint was served on the Defendant, Walter S. Alexander, on October 23, 1950, and he has to the date hereof, failed to plead, answer or demur to the said complaint as required by law.

This suit is to recover the sum of \$594.26, together with interest thereon from October 1, 1949, due from the Defendant to the Plaintiff on account and there was attached to the Bill of Complaint in this cause, an itemized, verified statement of the account sued on.

WHEREFORE, the Plaintiff respectfully moves this Honorable Court to render a judgment for the Plaintiff and against the Defendant for the amount sued for plus interest at the rate of six percent per annum from October 1, 1949 to December 15, 1950, together with the costs heretofore incurred in this cause.

Respectfully submitted,

CHASON & STONE

By:


Attorneys for Plaintiff.

SUMMONS AND COMPLAINT

Baldwin Times

THE 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 Walter S. Alexander, individually and d/b/a
Alexander Plumbing 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 _____

Walter S. Alexander, D/b/a Alexander Plumbing Company, Defendant

by Parnell-Martin-Gunn Supply Company, a corp.

_____, Plaintiff

Witness my hand this 18th day of October 19 50

Rice J. Duck, Clerk

PARNELL-MARTIN-GUNN SUPPLY
COMPANY, A Corporation,

Plaintiff,

vs.

WALTER S. ALEXANDER, individually,
and doing business as ALEXANDER
PLUMBING COMPANY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

COUNT ONE:

The Plaintiff claims of the Defendant Five Hundred Ninety four and 26/100 Dollars (\$594.26) due from him by account on the 1st day of October, 1949, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant Five Hundred Ninety four and 26/100 Dollars (\$594.26) for merchandise, goods and chattels sold by the Plaintiff to the Defendant from May 12, 1949, to September 23, 1949, which sum of money, with the interest thereon is still unpaid.

CHASON & STONE

BY:

Melburn F. Stone
Attorneys for Plaintiff.

There is attached hereto an itemized
verified statement of the account which
is the basis of this suit.

CHASON & STONE

BY:

Melburn F. Stone
Attorneys for Plaintiff.

THE STATE OF ALABAMA,)
COUNTY OF TALLAPOOSA.)

Before me the undersigned authority in and for said County in said State, personally appeared Render Gross, who being by me first duly sworn, deposes and says that he is Office Manager of Parcell-Martin-Gunn Supply Co., A Corporation, and by such corporation expressly authorized to make this affidavit; that he has personal knowledge of the matters and things herein averred; that he is familiar with the books and accounts and business of said corporation; that the foregoing and attached account against Alexander Plumbing Company, of Bay Minette, Alabama, is true and correct after the allowance of all credits, and that there is now due and owing on said account to said Corporation the sum of \$594.26, together with the legal interest thereon.

Sworn to and subscribed
before me this 16th day of
October, 1950.

Richard H. Hester
NOTARY PUBLIC.

My commission expires
11/21/51.

Render Gross

Render Gross.

ms 15-71

RECORDED

SUMMONS AND COMPLAINT

Received in Sheriff's Office
this 18 day of Oct, 1950
TAYLOR WILKINS, Sheriff

PARNELL-MARTIN-GUNN SUPPLY
COMPANY, A Corporation,

Plaintiff,

vs.

WALTER S. ALEXANDER, Individually,
and doing business as ALEXANDER
PLUMBING COMPANY, Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

FILED

OCT 18 1950

ALICE J. DUCK, Clerk

Executed Oct 23 1950
by serving copy of within Summons and
Complaint on

Walter S. Alexander

By Taylor Wilkins Sheriff
H. F. Hall Deputy Sheriff

1571

RECORDED

MOTION FOR JUDGMENT BY DEFAULT

PARNELL-MARTIN-GUNN SUPPLY
COMPANY, A Corporation,

Plaintiff,

vs.

WALTER S. ALEXANDER, individ-
ually and doing business as
ALEXANDER PLUMBING COMPANY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

FILED
DEC 15 1950
ALICE I. DUCK, Register

7221578

RECORDED

ANSWER

J. V. PHILLIPS,

PLAINTIFF

VS:

HELEN ANDRESS,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 2511

FILED

MAR 28 1951

ALICE J. DICK, Register

2571
RECORDED

J. V. PHILLIPS
Plaintiff

VS

Helen Anders, Alias

HELEN ANDRESS
Defendant

MOTION

Law Offices

C. LeNoir Thompson
Bay Minette, Alabama

FILED

OCT 4 1950

ALICE J. DICK, Clerk

700 25-9-12

RECORDED

DECEMBER

J. V. PHILLIPS,

Plaintiff

VS.

HELEN ANDRESS,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW - No. 2511

FILED

AUG 24 1960

AUG 1, 1960, CLERK

Received in Sheriff's Office
this 20 day of July 1950
TAYLOR WILKINS, Sheriff

Served 7-26-50

NO 25-175

RECORDED

J. V. PHILLIPS

Plaintiff

Vs

HELEN ANDRESS Defendant

SUMMONS AND COMPLAINT

Filed 7/19-50
A. C. LeNoir
Register

From the law office of
C. LeNoir Thompson
Bay Minette, Alabama

We the jury find in favor of the
Plaintiff and award him \$45.00 for
work done on this property

J. V. Phillips
Agree

STATEMENT

Parnell-Martin-Gunn Supply Co.

P. O. BOX 309

TELEPHONES 816 - 817

ALEXANDER CITY, ALABAMA

October 13, 1950

Alexander Plumbing Co.

Bay Minette, Ala.

DATE	INVOICE NO.	CHARGES	CREDITS	BALANCE
			BALANCE FORWARD	
2/49	5088	285.47		
7/49	5329	196.93		
7/49	5336	52.00		
4/49	5389	118.85		
10/49	5540	92.79		
10/49	Check		150.00	
7/49	5571	47.15		
11/49	5632	153.09		
5/49	5701	26.55		
5/49	5702	10.31		
25/49	5783	44.30		
25/49	5789	18.75		
29/49	Check		134.75	
5/49	5922	30.78		
17/49	Check		400.00	
23/49	6515	202.04	Total	\$594.26

Parnell-Martin-Gunn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

ALEXANDER CITY, ALA.

5088

SOLD TO Alexander Plumbing Company

INVOICE

N^o ~~118085~~ 18085

Bay Minette, Ala.

YOUR ORDER NO.

SHIPPED BY C. of Ga.

TERMS: 2% 10 N 30

SALESMAN Gunn

6	Washdown closets w/seats	26.00 ea.	\$156.00
4	17 x 19" C.I. wide drill lavatories	14.05 ea.	56.20
6	1 1/2" Chrome P-traps	1.51 ea.	9.06
6	1 1/2" Chrome P-traps	1.70 ea.	10.20
6 pr.	3/8 x 12" flexible angle basin supplies	.90 pr.	5.40
6	3/8 x 12" flexible straight closet sup.	.50 ea.	3.00
3	Cold water lavatory faucets	2.00 ea.	6.00
1 pr.	Hot & cold lavatory faucets	4.00 pr.	4.00
6	2" C. I. P-traps	1.15 ea.	6.90
18	1/2" Rough brass hose bibbs	.60 ea.	10.80
6	3/4" Compression stop & wastes	.80 ea.	4.80
57#	Rope Oakum	23.00 C	<u>13.11</u>

Total.....\$285.47

CE

Parnell-Martin-Gunn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

ALEXANDER CITY, ALA.

June 7, 1949

5329

SOLD TO Alexander Plbg. Co.

INVOICE

N^o ~~118086~~

Bay Minette, Ala.

YOUR ORDER NO.

SHIPPED BY C. of Ga.

TERMS: 2% 10 N 30

SALESMAN Gunn

1	20 gal. Series #21 Nat. Gas Heater	47.50 ea.	\$47.50
2	#4254 lavatories		
2	Plain centersets	18.36 set	36.72
2	P.O. Plugs		
4	3/8 x 12" Closet supply, St. flex.	No Charge	
6	Ball Cocks	1.45 ea.	8.70
6	Float copper balls	.30 ea.	1.80
12	Tank Balls	.25 ea.	3.00
24	1/2" Hose bibbs	.55 ea.	13.20
6	1 1/4" C.P. P-traps	1.40 ea.	8.40
12	10" Float rods	.10 ea.	1.20
6	3/4" Compression stop & wastes	.75 ea.	4.50
1	#112 Diverter valve	9.75 ea.	9.75
1	#181 Trip lever waste & overflow	5.25 ea.	5.25
1	#60 Overrim tub filler	7.95 ea.	7.95
111 1/2 #	Lead	17.00 C	18.96
6	2" Lead & Iron roof flashings	1.20 ea.	7.20
6	3" Lead & Iron roof flashings	1.35 ea.	8.10
12	Preformed Closet rings	.30 ea.	3.60
6	5' Curtain rods	1.85 ea.	11.10

Total.....\$196.93

CE
Parnell-Martin-Gunn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

ALEXANDER CITY, ALA.

June 7, 1949

5336

SOLD TO Alexander Plbg. Co.

Bay Minette, Ala.

INVOICE

N^o ~~13087~~

YOUR ORDER NO.

SHIPPED BY C. of Ga.

TERMS: 2% 10 N 30

SALESMAN Gunn

2	Close coupled Gerber closets w/seats	26.00 ea.	\$52.00
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CE
Parnell-Martin-Gunn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

ALEXANDER CITY, ALA.

June 14, 1949

SOLD TO Alexander Plbg. Co.

Bay Minette, Ala

INVOICE

5389
No ~~XXK2088X~~ 13088

YOUR ORDER NO.

SHIPPED BY C. of Ga.

TERMS: 2% 10 N 30

SALESMAN Gunn

1	5' C.I.Tub, R.H.	61.35 ea.	\$61.35
1	Diverter Valve	12.45 ea.	12.45
1	Trip lever waste & overflow	6.25 ea.	6.25
1	Gerber shower stall	52.00 ea.	<u>52.00</u>

132.05
Less 10% Discount 13.20
Total.....\$118.85

CE

Parnell-Martin-Gunn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

ALEXANDER CITY, ALA.

SOLD TO Alexander Plumbing Co. June 30, 1949

INVOICE

5540
N^o ~~13089~~

Bay Minette, Ala.

YOUR ORDER NO.

SHIPPED BY C. of Ga.

TERMS: 2% 10 N 30

SALESMAN Gunn

1	18 x 20" Martha Washington lavatory comp. w/faucet, supplies w/stop, towel bar and hex legs	49.20 ea.	B O
2	1 1/4" C.P. P-traps	1.40 ea.	2.80
1	17 x 19" Savoy Jr. lavatory comp. w/ faucet, supplies w/stop, towel bars & hex legs	34.20 ea.	B O
2	Sylenta closets w/supplies	33.45 ea.	66.90
2	#50 Olsonite white seats w/lids	8.70 ea.	17.40
2	15 x 20" 1200 BTU wall type radiant gas heaters	14.75 ea.	B O
1	42" 1300 GPM automatic Louveres attic fan	120.90 ea.	B O
1	Gerber close coupled closet tank	16.00 ea.	16.00
			103.10

Less 10% quantity dis. 10.31

Total.....\$ 92.79

Note: Items shown on B.O. are being shipped from Charlotte, N.C.

Parnell-Martin-Gunn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

ALEXANDER CITY, ALA.

7/7/49

SOLD TO Alexander Plbg. Co.

Bay Minette, Ala.

INVOICE

5571
N^o ~~13090~~

YOUR ORDER NO.

SHIPPED BY Parcel Post

TERMS: 2% 10 N 30

SALESMAN Gunn

12	Herculean Closet Seats	3.75 ea.	\$45.00
		Parcel Post	<u>2.15</u>
		Total	\$47.15

Note: Your sink is being shipped from Charlotte.

I CE

Parnell-Martin-Gunn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

ALEXANDER CITY, ALA.

July, 11, 1949

SOLD TO Alexander Plbg. Co.

Bay Minette, Ala.

INVOICE

5632
N^o ~~18091~~X

YOUR ORDER NO.

SHIPPED BY Great Southern

TERMS: 2% 10 N 30

SALESMAN Gunn

1	18 x 20" #B3150 P.T. N.D. lavatory	49.20 ea.	\$49.20
1	42" Attic Fan	120.90 ea.	<u>120.90</u>
			170.10
		Less 10%	<u>17.01</u>
		Total	\$153.09

Parnell-Martin-Junn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

ALEXANDER CITY, ALA.

July 15, 1949

SOLD TO Alexander Plbg. Co.

Bay Minette, Ala.

INVOICE

N^o ⁵⁷⁰¹
~~13092~~

YOUR ORDER NO.

SHIPPED BY From factory

TERMS: 2% 10 N 30

SALESMAN

2	#112 Wall Heaters	14.75 ea.	\$29.50
		Less 10%	<u>2.95</u>
		Total	\$26.55

Note: This completes your special order with the exception of the Savoy Jr. lavatory which should be shipped in a few days.

Parnell-Martin-Punn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

SOLD TO Alexander Plumbing Co.
Bay Minette, Ala.

ALEXANDER CITY, ALA.

July 15, 1949

INVOICE

5702
N^o ~~13093~~

SHIPPED BY Parcel Post

TERMS: 2% 10 N 30

YOUR ORDER NO.

SALESMAN

1	#709-A Deck type faucet w/spray	9.90 ea.	\$9.90
		Parcel Post & Ins.	<u>.41</u>
		Total	\$10.31

Note: The 54 x 25" Sink is being shipped direct from
Richmond Radiator Co.

CE
Parnell-Martin-Junn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

ALEXANDER CITY, ALA.

July 25, 1949

SOLD TO Alexander Plumbing Co.

Bay Minette, Ala.

INVOICE

5783
N^o ~~13094~~

YOUR ORDER NO.

SHIPPED BY Direct from factory

TERMS: 2% 10 N 30

SALESMAN

1	#1535 54 x 25" Richmond Sink	48.20 ea.	\$48.20
		Less freight allowance	<u>3.90</u>
		Total	\$44.30

Parnell-Martin-Junn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

ALEXANDER CITY, ALA.

July 25, 1949

SOLD TO Alexander Plbg. Co.
Bay Minette, Ala.

INVOICE

5789
Nº ~~X18095~~

YOUR ORDER NO.

SHIPPED BY C. of Ga.

TERMS: 2% 10 N 30

SALESMAN

1 17 x 19" C.I. Centerset lavatory
w/faucet

18.75 ea.

\$18.75

I CE

Parnell-Martin-Tunn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

ALEXANDER CITY, ALA.

Aug. 6, 1949

SOLD TO Alexander Plumbing Co.

Bay Minette, Ala.

INVOICE

5922
N^o ~~18096~~

YOUR ORDER NO.

SHIPPED BY Denton Express

TERMS: 2% 10 N 30

SALESMAN

1 Savoy Jr. lavatory w/faucet, supplies
w/stop, towel bars & hex legs

34.20 ea.

\$34.20

Less 10%

3.42

Total

\$30.78

Parnell-Martin-Zunn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

SOLD TO Alexander Plumbing Co.

ALEXANDER CITY, ALA.

August 19, 1949

INVOICE

6050
N^o ~~118097~~

Bay Minette, Ala.

SHIPPED BY Parcel Post

TERMS: 2% 10 N 30

YOUR ORDER NO.

SALESMAN

1 pr. Chrome towel bars for C.I. lavatory

1 pr. 3/8 x 12" Lavatory supply pipes
w/stops

No Charge

Parnell-Martin-Gunn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

SOLD TO Alexander Plumbing Co.

ALEXANDER CITY, ALA.

Sept. 23, 1949

INVOICE

No. 6515
13098

Bay Minette, Ala.

YOUR ORDER NO.

SHIPPED BY C. of Ga.

TERMS: 2% 10 N 30

SALESMAN Gunn

36	1/2" R. B. Hose bibbs		
12	3/4" Comp. stop & wastes	.60 ea.	\$21.60
12	Preformed Closet rings		B 0
6 pr.	3/8 x 12" angle lav. supplies w/stops	.30 ea.	3.60
6 pr.	3/8 x 12" angle lav. supplies 1/stops	2.40 pr.	14.40
12	3/8 x 20" Flex. closet St. supplies	.90 ea.	5.40
6	C.P. P.O. Plugs 1 1/4" w/chain	.65 ea.	7.80
6	Ideal Basket strainers	.90 ea.	5.40
6	1 1/4" C.P. P-traps	1.55 ea.	9.30
3	1 1/4" C.P. S-traps	1.51 ea.	9.06
3	1 1/2" C.P. S-traps	2.03 ea.	B 0
2	Green Herculean Closet seats	2.34 ea.	7.02
2	Orchid " " "	3.75 ea.	7.50
2	Blue " " "	3.75 ea.	7.50
6	2" Flush ells 4 x 6" w/S.J. nuts & washers	3.75 ea.	7.50
12	8" Float ball rods	1.35 ea.	8.10
12	10" Float ball rods	.08 ea.	.96
12	Upper wires	.10 ea.	B 0
12	Lower wires	4.50 hd.	.54
12	Adjustable guide arms	3.50 hd.	.42
2	12 to 15,000 BTU wall insert bath heater	.40 hd.	B 0
6	2" Cleanouts		B 0
6	4" Cleanouts	.55 ea.	3.30
		.85 ea.	5.10

(Cont'd on Page Two)

Parnell-Martin-Tunn Supply Co.

WHOLESALE PLUMBING SUPPLIES

PHONE 816 - 817

ALEXANDER CITY, ALA.

SOLD TO

Page Two

INVOICE

N^o ⁶⁵¹⁵
~~13098~~

SHIPPED BY

TERMS: 2% 10 N 30

YOUR ORDER NO.

SALESMAN

Page Two

6	2" C. I. P-traps
12	1/2" Steel Unions
12	1 1/2 x 6" Tailpieces
12	1/2" Sill cocks
12	3/4" Steel Unions
6	5' Curtain rods complete
144	Curtain pins
50#	Spun Oakum
102#	Lead

1.15 ea.	\$6.90
27.30 C	3.28
.38 ea.	4.56
.65 ea.	7.80
39.00 C	4.68
2.25 ea.	13.50
3.00 ea.	4.32
11.08 Hd.#	11.08
21.00 C#	21.42
Total	\$202.04