

MILLER HEATING AND AIR CONDITIONING) IN THE CIRCUIT COURT OF
COMPANY,)
Plaintiff,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW
BENJAMIN T. SMITH,) CASE NO. 6915
Defendant)

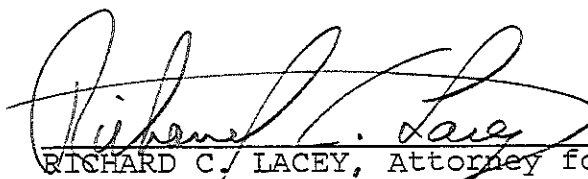
BILL OF COMPLAINT

I

The Plaintiff claims of the Defendant the sum of ONE HUNDRED TWENTY-FOUR AND 50/100 DOLLARS (\$124.50), due from him on account, to-wit, the 30th day of October, 1965, which sum of money with the interest thereon, is still unpaid.

II

The Plaintiff claims of the Defendant the sum of ONE HUNDRED TWENTY-FOUR AND 50/100 DOLLARS (\$124.50), due from him for merchandise, goods and chattels furnished by the Plaintiff to the Defendant on, to-wit, the 30th day of October, 1965, which sum of money with 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 PAUL J. DOWSEY, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 30th day of October, 1965, and due at present.

The Defendant Resides at
165 Pinecrest Street
Fairhope, Alabama

FILED
MAR 25 1966
JAMES L. DICKSON, Clerk

P.O. DRAWER A-J

RICHARD C. LACEY

TELEPHONE 928-2373

Attorney at Law

FAIRHOPE, ALABAMA

March 23, 1966

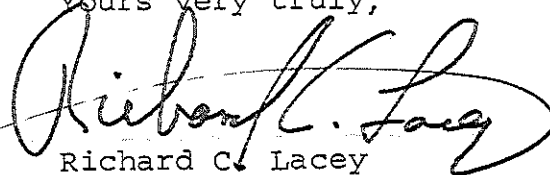
Mrs. Alice J. Duck
Clerk of the Circuit Court
Bay Minette, Alabama

RE: Miller Heating and Air Conditioning Company
VS.
Benjamin T. Smith

Dear Mrs. Duck:

Enclosed is Summons and Complaint in subject matter. Please
file and have served.

Yours very truly,

A handwritten signature in dark ink, appearing to read "Richard C. Lacey", written over a horizontal line.

Richard C. Lacey

Encl.

RCL:W

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 Benjamin T. Smith

.....
.....

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.....

..... Benjamin T. Smith, Defendant.....

by

..... Miller Heating and Air Conditioning Company, Plaintiff.....

Witness my hand this..... 1-5 day of March 1966

64-4-1-66
..... Louis J. Smith, Clerk

6915

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Miller Heating and Air
Conditioning Company

Plaintiffs

vs.

Benjamin T. Smith

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

..... Clerk

RICHARD C. LACEY
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

165 Pinecrest Street
Fairhope, Alabama

Received In Office

MAR 25 1966

19.....

TAYLOR WILKINS
SHERIFF

Sheriff

I have executed this summons

this 4/8 1966

by leaving a copy with

Benjamin T. Smith

Shirley, June 70

Ten Cent Court Fee 7.00

TAYLOR WILKINS
BY Roy Randall

Taylor Wilkins Sheriff
Roy Randall Deputy Sheriff

J. L. Lyle

STATEMENT

PHONE 928-5566

MILLER HEATING AND AIR CONDITIONING COMPANY
SOUND VALUE IN HEATING AND AIR CONDITIONING

55 NORTH SECTION STREET
FAIRHOPE, ALABAMA 36532

October 30 1965

Mr. Benjamin T. Smith

165 Pinecrest

Fairhope, Alabama

Balance Due

\$124 50

The foregoing is a true and correct account of the amount owed Miller Heating and Air Conditioning Company by Benjamin T. Smith and all credits have been given for set-offs or counterclaims.

Paul J. Dowsey
Paul J. Dowsey - Owner

Sworn and subscribed before me this 22nd day of March, 1966.

Frankie H. D.