

SUMMONS and COMPLAINT

THE STATE OF ALABAMA

BALDWIN COUNTY

NO. 1519

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

TERM, 1950

TO ANY SHERIFF OF THE
STATE OF ALABAMA:

You are Hereby Commanded to Summon FRED E. VARNES 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 E. VARNES, Defendant, by J. M. PONDER, individually and doing business as PONDER CO., Plaintiff.

Witness my hand this 21st day of June, 1950.

Archie L. Houch
Clerk of the Circuit Court.

J. M. PONDER,
individually and
doing business as
PONDER CO.,

-vs-

FRED E. VARNES,

Plaintiff

Defendant

The Plaintiff claims of the Defendant the sum of Five Hundred Seventy-seven and 98/100 Dollars (\$577.98) due by account made on, to-wit, the tenth day of June, 1950, which sum of money together with interest on it is still due and unpaid.

RICKARBY & RICKARBY

By

E. G. Rickarby, Jr.
Attorney for Plaintiff

The account sued on is evidenced by an itemized, verified statement filed herewith.

RICKARBY & RICKARBY

By

E. G. Rickarby, Jr.
Attorney for Plaintiff

RECORDED

NO. 1519

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

 TERM, 1950.

SUMMONS and COMPLAINT

J. M. PONDER, Individually
and doing business as
PONDER CO.,

Plaintiff,

-VS-

FRED E. VARNES,

Defendant

FILED

JUN 21 1950
Defendant's Address
Fairhope, Alabama
Alice A. Duck, Clerk

RICKARBY & RICKARBY
Attorneys for Plaintiff

Executed 6-30-50
by serving copy of within Summons and
Complaint on

Fred Varnes

Taylor Wilkins Sheriff

By W. H. D. Doney Deputy Sheriff

ELLIOTT G. RICKARBY

LAW OFFICES
RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

13 June 1950

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

Dear Mrs. Duck:

J. M. PONDER -vs- FRED E. VARNES:

Enclosed are Summons and Complaint, copy thereof,
and itemized and verified statement of account in
subject case. Will you please file same. Thank
you.

The Defendant resides in Fairhope and is engaged
in business here.

Yours very truly

RICKARBY & RICKARBY

By



EGR, Jr.:M

Enc.

CC: Mr. J. M. Ponder

852

BALDWIN COUNTY

State of Alabama---~~Mobile County~~

CIRCUIT COURT, OCTOBER TERM 19 50

J. M. Ponder, individually
and doing business as
Ponder Company

vs.

Fred E. Varnes

Bay Minette, Ala.

~~MOBILE, ALA.~~

July 14 19 50

J. Terry Reynolds, Jr. appears for

Fred E. Varnes Defendants

in the above entitled cause and reserve the right to demur or plead specially.

The defendant demands a trial by jury in this case.

J. Terry Reynolds, Jr.
Attorney for Defendant

No. 1519

APPEARANCE

vs.

Filed in Office

, 19

FILED

JUL 22 1950

ALICE J. DUCK, Clerk

Clerk

BALDWIN COUNTY

State of Alabama---~~Mobile County~~

CIRCUIT COURT, OCTOBER TERM 1950

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Attorney for Defendant

RECORDED

No. 15-19

APPEARANCE

vs.

Filed in Office

FILED

JUL 22 1950

ALICE J. DUCK, Clerk

Clerk

BALDWIN COUNTY

State of Alabama---~~Mobile County~~

CIRCUIT COURT, OCTOBER TERM 19 50

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The defendant demands a trial by jury in this case.

J. Terry Reynolds, Jr.
Attorney for Defendant

STATE OF ALABAMA
COUNTY OF BALDWIN

Before me, the undersigned Notary Public, personally
J. Jefferson Bennett, who, being first duly sworn, deposes
and says that he is a practicing attorney of the Baldwin
County Bar and as such is familiar with the charges made
for suits in the Circuit Court of Baldwin County, and
that the sum of Twenty-five Dollars is a reasonable fee
for the attorney for the Plaintiff for a non-contested
suit on a promissory note, where the amount involved is
One Hundred Forty-four and 20/100 Dollars.


AFFIANT

Subscribed and sworn to before
me on the 18 day of August,
1950.


Notary Public, Baldwin County, Alabama



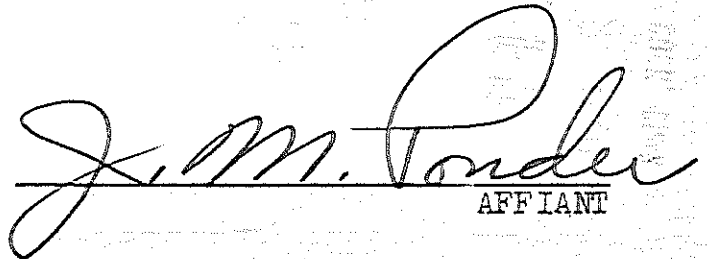
RECORDED



STATE OF ALABAMA

COUNTY OF BALDWIN

Before me, the undersigned Notary Public, personally appeared J. M. PONDER, who, being first duly sworn, deposes and says that he is the owner of the PONDER CO., and as such has knowledge of the correctness of the account between said firm and FRED E. VARNES and that the attached itemized statement correctly shows such account and that the balance of Five Hundred Seventy-Seven and 98/100 ----- DOLLARS (\$577.98) shown thereon is still due after allowance of all proper credits and is unpaid.


AFFIANT

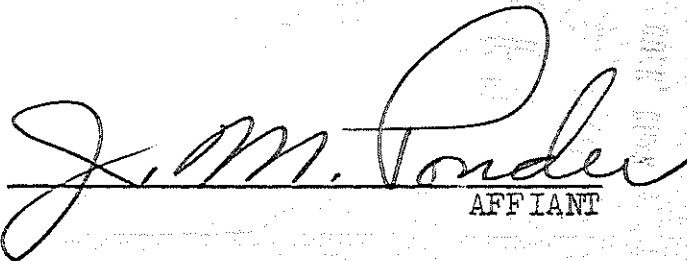
Subscribed and sworn to before me on this the 13th day of June, 1950.


Notary Public, Baldwin County,
State of Alabama

STATE OF ALABAMA

COUNTY OF BALDWIN

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AFFIANT

Subscribed and sworn to before me on this the 13th
day of June, 1950.


Notary Public, Baldwin County,
State of Alabama

PONDER CO. 169

P. O. BOX 13

FAIRHOPE, ALA.

PHONE 5451

BUTANE - PLUMBING - ELECTRICAL
WATER WELLS & PUMPS
SALES INSTALLATIONS SERVICE
Serving the Eastern Shore

Copy

Payments made

Date 6-11-50 1950

Sold to Fred Varnes

Address F Hope -

	Dec 7			725.74
June	10	Pd -	8.39	
June	15	Pd.	7.00	
June	23	Pd -	5.00	
Nov.	2	"	.17	
Sept	23	Credit on ltr	40.00	
✓	✓	Pd	10.00	
Oct.	13	Pd	10.00	
Oct.	20	✓	10.00	
Nov.	10	✓	10.00	
Nov	17	✓	10.00	
Dec.			5.00	
Dec	30	✓	1.92	
Feb.	10	✓	5.00	
Feb	16	Goods Ref	7.38	
Feb	25		12.90	
March	7		5.00	
			147.76	147.76
		Bal - Due -		577.98

1 PONDER CO. 16890

P. O. BOX 13

FAIRHOPE, ALA.

PHONE 5451

BUTANE - PLUMBING - ELECTRICAL
WATER WELLS & PUMPS
SALES INSTALLATIONS SERVICE

Serving the Eastern Shore

Copy

Sold to Fred. Varner Date 6-10 1942

Address F. Hope - Ala.

3-29-49 #20244			
1 3/4" Die Head		3.75	
	<i>Sale Tax</i>	07	
4-1-49 #21797			
40 gals Butane @.19		6.40	
4-1-49 #15-245			
1 MA-9 - 8.5 Crosby		3.05	76
Shelborn Ref.			
	<i>Sale Tax</i>	6.12	
5-7-49 #22602			
45 gals Butane @.19		8.55	
		33.65	
5-26-49 out of ck		5.00	
		325.85	

Page #2

P.O. BOX 13

PONDER CO. 16891

FAIRHOPE, ALA.

PHONE 5451

BUTANE - PLUMBING - ELECTRICAL

WATER WELLS & PUMPS

SALES INSTALLATIONS SERVICE

Serving the Eastern Shore

Copy

Date 6-10-50

Sold to

Mrs. Fred W. Wines

Address

Fairhope - Ala.

	Fud,		
11-14-49 # 18577			325.85
16 ft. Lufkin Rule			1.00
Sale Tax			.02
5-13-49 # 19113			
1 #00 Ridgid Tucking Cutter			2.90
1 14" offset wrench			2.85
1 10" " "			2.17
Sale Tax			.16
6-21-49 # 19153			
1 B.E. 12" Level			2.15
Sale Tax			.05
10-17-49 # 16251			
1 100W. Light Bulb			.17
7-8- Crosby Shearline Ret			305.96
6-2 #22240			
1 #50 5/8 x 4 1/2 C. Iron			5.00
1 #51 " " S. Tax			5.00
			.02
			322.38

Sheet 3

PONDER CO. 16892

P. O. BOX 13

FAIRHOPE, ALA.

PHONE 5451

BUTANE - PLUMBING - ELECTRICAL
WATER WELLS & PUMPS
SALES INSTALLATIONS SERVICE
Serving the Eastern Shore

Spay

Date 6-10 1945

Sold to Fr

Address _____

		Fwd	32.38
11-23-49 # 10503			
1 Brilliant Fire Radiant Heater			30.00
	See Tax		60
9-8-49			
Personal Loan			575.00
12-1-49 # 1896 F			
2-60 W 120 V. Bulbs @ 13			26
1-100 " " " @ 17			17
	Tax		01
12-17-49 # 11460			
15 ft. 0 S J cord @ 06			90
2 phase. board Recept. @ 20			40
1 attch. plug mace			15
	See Tax		03
			639.90

Page # 4

PONDER CO. 16893

P. O. BOX 13

FAIRHOPE, ALA.

PHONE 5451

BUTANE - PLUMBING - ELECTRICAL
 WATER WELLS & PUMPS
 SALES INSTALLATIONS SERVICE
 Serving the Eastern Shore

Copy

Date 6-10-1940

Sold to

Fred Varnes

Address

Fhope - Ala

	Fwd.	639.90
Feb. 2 # 16504		
1 Belt Hsg.		1.49
1 Universal Joint		5.17
1 Set Sock		18
	Sale Tax	14
2-6 # 16662		
1 Rule 6 ft.		100
	Sale Tax	02
	Interest to date	648.30
		17.27
Jan 15-49.1 Horton		
Model 121	59.95	
Less 10%	6.00	
	53.95	
	Sale Tax	1.08
		55.03
	Interest to date	55.14
		725.74

1519

RECORDED

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535
MAY 19 1964
COMMUNICATIONS SECTION
TELETYPE UNIT
TO DIRECTOR
FROM SAC, NEW YORK
SUBJECT: [illegible]
RE: [illegible]