

1713

FRED F. SMITH, JR.

ATTORNEY AT LAW

70 MAIN STREET

PRICHARD, ALA.

PHONE 6-7318

P. O. BOX 3422

July 19, 1952

Mrs. Alice Duck
Clerk Of Court
Bay Minette, Ala.

RE: H. England Lumber Co.
VS: L.J. Postle

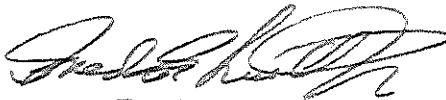
~~Dear Mrs. Duck:~~

Congratulations upon your re-election!

Please file the enclosed affidavit in its file
and when I'm over Bay Minette way I'll mark the judgment
satisfied on the record. I understand Mr. England marked
it satisfied on the record.

Thank you.

Sincerely,

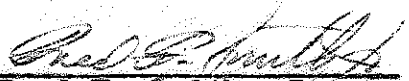


Fred F. Smith Jr.

HERBERT C. ENGLAND, doing business | IN THE CIRCUIT COURT OF
as H. ENGLAND LUMBER COMPANY, | BALDWIN COUNTY, ALABAMA
Plaintiff |
vs. | AT LAW
L. J. POSTLE, |
Defendant | CASE NO. 1713

MOTION FOR DEFAULT JUDGMENT

Comes now the plaintiff by his attorney in the above styled cause and it being made to appear that the defendant has not filed an answer, plea or demurrer in the cause, asks that this Honorable Court enter a judgment by default in the cause and offers the sworn itemized statement of account attached hereto with this motion as evidence of the amount due and unpaid as claimed in the suit and asks that judgment be rendered for the amount claimed, that amount being \$238.83, together with interest since December 30, 1950.


Fred F. Smith, Jr.
Attorney for plaintiff

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 is hereto attached, personally appeared Herbert C. England known to me, who being duly sworn, upon his oath stated he is a sole trader doing business as H. England Lumber Company; that as such he makes this affidavit; that he is familiar with the books and business of H. England Lumber Company; that the attached account against L. J. Postle 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 L. J. Postle at the special instance and request of the debtor and that the credit has been duly made for all payments and just and lawful offsets to which said account is entitled as thereon stated and that the balance thereof amounting to the sum of two hundred thirty-eight dollars and eighty-three cents (\$238.83) with interest from December 30, 1950, is justly due and remains unpaid.

Herbert C. England

STATE OF ALABAMA ↓

COUNTY OF MOBILE ↓

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 20th day of December 1951.

Fred F. Smith
Notary Public

1 AMAGALA TO ETATS
1 ELISON TO YPNUOC

FILED
DEC 22 1951
ALICE J. DUCK, Registrar

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1 AMAGALA TO ETATS
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Herbert C. England d/b/a
H. England Lumber Co.

v.

L.J. Postle

IN THE CIRCUIT COURT OF BALDWIN

COUNTY ALABAMA

AT LAW

CASE NO. 1713

AFFIDAVIT

2691513
Comes now Fred F. Smith Jr. Attorney of record in the
above styled cause and files this affidavit and says that
the judgment obtained in the above styled case in the Baldwin
County Circuit Court and recorded in Judgment Book 5 Page
218 Office of the Probate Judge of Baldwin County has been
satisfied in full as to the judgment and costs therein.


Fred F. Smith Jr.


Attorney for plaintiff

FILED
JUL 1 1925
CLERK
BALDWIN COUNTY

HERBERT C. ENGLAND, doing business | IN THE CIRCUIT COURT OF
as H. ENGLAND LUMBER COMPANY, | BALDWIN COUNTY, ALABAMA
Plaintiff |
vs. | AT LAW
G. M. MILLS, |
Defendant | CASE NO. 1714

MOTION FOR DEFAULT JUDGMENT

Comes now the plaintiff by his attorney in the above styled cause and it being made to appear that the defendant has not filed an answer, plea or demurrer in the cause, asks that this Honorable Court enter a judgment by default in the cause and offers the sworn itemized statement of account attached hereto with this motion as evidence of the amount due and unpaid as claimed in the suit and asks that judgment be rendered for the amount claimed, that amount being \$149.83, together with interest since February 14, 1950.


Fred F. Smith, Jr.
Attorney for plaintiff

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 is hereto attached, personally appeared Herbert C. England known to me, who being duly sworn, upon his oath stated he is a sole trader doing business as H. England Lumber Company; that as such he makes this affidavit; that he is familiar with the books and business of H. England Lumber Company; that the attached account against G. M. Mills 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 G. M. Mills at the special instance and request of the debtor and that the credit has been duly made for all payments and just and lawful offsets to which said account is entitled as thereon stated and that the balance thereof amounting to the sum of one hundred forty-nine dollars and eighty-three cents (\$149.83) with interest from February 14, 1950, is justly due and remains unpaid.

Herbert C. England

STATE OF ALABAMA }

COUNTY OF MOBILE }

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 20th day of December 1951.

W. L. Cable
Notary Public

AMARALA TO STAFFS
HIGSON TO WYNNOC
FILED
DEC 28 1951
ALICE J. DUCK, Clerk

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RECORDED

STATEMENT

H. ENGLAND LUMBER COMPANY

LUMBER - PAINT - BUILDING SUPPLIES

ROBERTSDALE, ALABAMA

Mr. G.M. Mills
Foley, Ala.

	INVOICE NO.	CHARGES	CREDIT	BALANCE
9-12-49	07086	99.24		
13-	07108	8.13		
15-	07127	116.44		
20-	07163	13.16		
15-	1005		12.14	
10-17-	2833		50.00	
2-14-50	3215		25.00	149.83

H. ENGLAND LUMBER CO.

SAW MILL AND RETAIL YARD

9/13/49

194

NAME _____

ADDRESS

[illegible]

H. ENGLAND LUMBER CO.

SAW MILL AND RETAIL YARD

194

NAME _____

ADDRESS

[illegible]

H. ENGLAND LUMBER CO.

PHONE 56
SAW MILL AND RETAIL YARD
ROBERTSDALE, ALA. 9/20/49 194

NAME G. M. Mills

ADDRESS Magnolia Springs, Ala.

[illegible]

H. ENGLAND LUMBER CO.

PHONE 56
SAW MILL AND RETAIL YARD
ROBERTSDALE, ALA. 9/15/49 194

NAME G.M. Mills

ADDRESS Magnolia Springs, Ala.

[illegible]

H. ENGLAND LUMBER CO.

PHONE 86

SAW MILL AND RETAIL YARD

ROBERTSDALE, ALA.

9/15/49

194

NAME

G.M. Mills

ADDRESS

Magnolia Springs, Ala.

[illegible]

HERBERT C. ENGLAND, doing business | IN THE CIRCUIT COURT OF
as H. ENGLAND LUMBER COMPANY, | BALDWIN COUNTY, ALABAMA
Plaintiff |
vs. | AT LAW
G. M. MILLS, |
Defendant | CASE NO. 1714

MOTION FOR DEFAULT JUDGMENT

Comes now the plaintiff by his attorney in the above styled cause and it being made to appear that the defendant has not filed an answer, plea or demurrer in the cause, asks that this Honorable Court enter a judgment by default in the cause and offers the sworn itemized statement of account attached hereto with this motion as evidence of the amount due and unpaid as claimed in the suit and asks that judgment be rendered for the amount claimed, that amount being \$149.83, together with interest since February 14, 1950.


Fred F. Smith, Jr.
Attorney for plaintiff

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 is hereto attached, personally appeared Herbert C. England known to me, who being duly sworn, upon his oath stated he is a sole trader doing business as H. England Lumber Company; that as such he makes this affidavit; that he is familiar with the books and business of H. England Lumber Company; that the attached account against G. M. Mills 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 G. M. Mills at the special instance and request of the debtor and that the credit has been duly made for all payments and just and lawful offsets to which said account is entitled as thereon stated and that the balance thereof amounting to the sum of one hundred forty-nine dollars and eighty-three cents (\$149.83) with interest from February 14, 1950, is justly due and remains unpaid.

Herbert C. England

STATE OF ALABAMA }

COUNTY OF MOBILE }

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 20th day of December 1951.

Chas. B. Smith

STATEMENT

H. ENGLAND LUMBER COMPANY

LUMBER - PAINT - BUILDING SUPPLIES

ROBERTSDALE, ALABAMA

Mr. C.E. Mills
Foley, Ala.

	INVOICE NO.	CHARGES	CREDIT	BALANCE
9-12-49	07080	98.24		
12-	07108	8.23		
15-	07127	116.44		
20-	07133	13.10		
15-	1005		12.14	
10-17-	2833		50.00	
2-14-50	3215		25.00	149.83

H. ENGLAND LUMBER CO.

PHONE 56

SAW MILL AND RETAIL YARD

ROBERTSDALE, ALA. 9/13/49 194

NAME ALBERT

ADDRESS 1000 1st St. N. W. Washington, D. C.

[illegible]

H. ENGLAND LUMBER CO.

PHONE 56

SAW MILL AND RETAIL YARD

ROBERTSDALE, ALA. _____ 194

NAME CHIN, HUI-YI

ADDRESS Magnolia Springs, Ala.

DESCRIPTION	FEET	PRICE	AMOUNT
Green Shingles	15 sq.	5.00	89.25
Rgh. 1x4- 2/10	14	60.00	.84
Rgh. 1x8- 2/10	40	58.00	2.20
Roofing Nails	250	2.00	2.00
			87.29
Sales tax			1.25
			88.54

H. ENGLAND LUMBER CO.

ROBERTSDALE, ALA.

194

SECRET

蘇聯政府與蘇聯人民 蘇聯政府與蘇聯人民 蘇聯政府與蘇聯人民

H. ENGLAND LUMBER CO.

ROBERTSDALE, ALA.

194

SECRET

NAME _____

FRED F. SMITH, JR.
ATTORNEY AT LAW
70 MAIN STREET
PRICHARD, ALA.

PHONE 6-7318

20 December 1951

P. O. Box 3422

Miss Alice Duck
Clerk-Register, Baldwin Circuit Court
Bay Minette, Alabama

Dear Miss Duck:

Enclosed is motion for default judgment with itemized verified statement of account in case #1713, England Lumber Co. vs. L.J. Postle. Also enclosed is affidavit of non-military service. I hope that everything is in order so that judgment can be entered.

Sincerely,

A handwritten signature in dark ink, appearing to read "Fred F. Smith Jr.", written in a cursive style.

Fred F. Smith Jr.

FRED F. SMITH, JR.
ATTORNEY AT LAW
70 MAIN STREET
PRICHARD, ALA.

PHONE 6-7318

20 December 1951

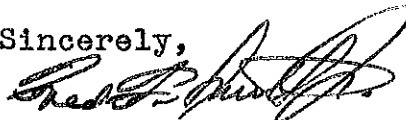
P. O. Box 3422

Miss Alice Duck
Clerk-Register, Baldwin Circuit Court
Bay Minette, Alabama

Dear Miss Duck:

Enclosed is motion for default judgment with itemized verified statement of account in case #1714, England Lumber Co. vs. G.M. Mills. Also enclosed is affidavit of non-military service. I hope that everything is in order so that judgment can be entered.

Sincerely,




Fred F. Smith Jr.

HERBERT C. ENGLAND doing business | IN THE CIRCUIT COURT OF
as H. ENGLAND LUMBER COM- | BALDWIN COUNTY,
PANY, | ALABAMA
Plaintiff |
vs. | AT LAW
G. M. MILLS, |
Defendant | CASE NO. _____

C O M P L A I N T

COUNT 1. The plaintiff claims of the defendant the sum of one hundred forty-nine dollars and eighty-three cents (\$149.83) due from him by account on, to-wit, February 14, 1950, which some of money with the interest thereon is still unpaid.


Fred F. Smith, Jr.
Attorney for Plaintiff

ADDRESS OF DEFENDANT:

Mr. G. M. Mills
Foley, Alabama

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1713.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon G. M. Mills

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 _____

G. M. Mills, Defendant

by Herbert C. England d/b/a H. England Lumber Co

_____, Plaintiff.....

Witness my hand this 5th day of October 19 51

Alice J. French, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

HERBERT C. ENGLAND d/b/a

H. ENGLAND LUMBER CO

Plaintiffs

vs.

G. M. MILES

Defendants

SUMMONS and COMPLAINT

Filed* 10-5-51, 19

Wingfield Clerk

RECORDED

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Oct. 5, 19*51*

Taylor Walker Sheriff

I have executed this summons

this *10-10*, 19*51*

by leaving a copy with

G. M. Mills

Taylor Walker Sheriff
W. F. Hall Deputy Sheriff

STATE OF ALABAMA }

COUNTY OF MOBILE }

Before me, Fred F. Smith, Jr., a notary public, in and for said State and County, personally appeared Herbert C. England, who is known to me and who by me being first duly sworn doth depose and say:

That he is the plaintiff in the case of Herbert C. England, doing business as H. England Lumber Company, vs. G. M. Mills, which is now pending for trial in the circuit court of Baldwin County, Alabama; that G. M. Mills, who is the defendant in the above styled cause, and who is in default of any appearance, and who has not demurred, pleaded or answered to the complaint in this cause, is not at this time a person in the military service of the United States, or in any branch of said service, but is presently residing in Baldwin County, Foley, Alabama, and that the plaintiff knows this to be true of his own personal acquaintance with the defendant up to the filing of this affidavit.

Herbert C. England

Sworn to and subscribed before me this 20th day of December, 1951.

Fred F. Smith, Jr.
Fred F. Smith, Jr.
Notary Public

Notary Public
Frederic E. Smith, Jr.

1931.

Sworn to and subscribed before me this _____ day of _____, 1931.

and acquaintance with the defendant up to the filing of this affidavit and that the plaintiff knows this to be true of his own personal and is presently residing in Belgium County, Iowa, Adams, service of the United States, or in any branch of said service in this cause, is not at this time a person in the military and who has not voluntarily pledged or answered to the complaint above styled cause, and who is in default of said summons, County, Adams; that G. Wills, who is the defendant in the which is now pending for trial in the circuit court of Belgium going business as H. England Import Company, as G. W. Wills, that he is the plaintiff in the case of Herbert C. England, both debts and say:

James, who is known to me and who is being tried and sworn for said State and County, personally observed Herbert C. England before me, Fred E. Smith, Jr., a Notary Public, in and

COUNTY OF MOBILE
STATE OF ALABAMA

8161