

SUMMONS AND COMPLAINT

1823

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons M. J. Jansen, individually, and M. J. Jansen Lumber Company to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Ray E. Loper Lumber Company, a corporation.

Witness my hand, this 2nd day of July, 1952.

Alvin J. Leuck
CLERK

RAY E. LOPER LUMBER COMPANY,
A CORPORATION,

PLAINTIFF,

VS.

M. J. JANSEN, individually,
and ~~M. J. JANSEN LUMBER~~
COMPANY,
DEFENDANT.

X
X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA.
X AT LAW
X CASE NO. _____
X

COUNT ONE: Plaintiff claims of the Defendant ONE THOUSAND FOUR HUNDRED FIVE and 47/100 (\$1,405.47) DOLLARS due from him by account on to-wit, the 18th day of March, 1952, which sum of money with interest thereon is still unpaid.

COUNT TWO: Plaintiff claims of the Defendant the sum of ONE THOUSAND FOUR HUNDRED FIVE and 47/100 (\$1,405.47) DOLLARS due from him by account on to-wit, the 18th day of March 1952, which sum or money with interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is attached hereto as Exhibit "A" and made a part thereof.

C. LeNoir Thompson

Tolbert M. Brantley

By:

C. LeNoir Thompson
Attorneys for Plaintiff

701823
ISSUANCE AND COMPLAINT

RECORDED

RAY H. LOPEZ LUMBER COMPANY, A
CORPORATION,

PLAINTIFF

VS.

H. J. JANSSEN, individually, and
H. J. JANSSEN LUMBER COMPANY,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. _____

FILED 7-7-52

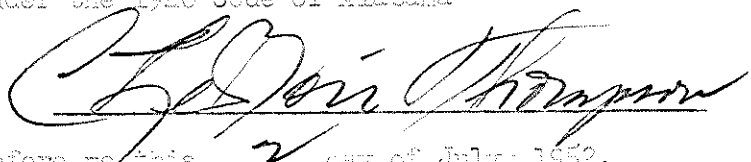
Alice J. Church
CLERK

STATE OF ALABAMA }
BALDWIN COUNTY }

BALDWIN COUNTY }

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, C. LeMoire Thompson, a credible person and attorney for Ray E. Loper Lumber Company, a corporation, who being sworn, deposes and says: That M. J. Jansen, Sr., individually, and d/b/a M. J. Jansen Lumber Company is indebted to Ray E. Loper Lumber Company, a corporation, in the sum of ONE THOUSAND FOUR HUNDRED FIVE AND 47/100 DOLLARS, and that he has commenced suit by summons and complaint returnable to the next term of the Circuit Court of Baldwin County against M. J. Jansen, Sr., individually, and d/b/a M. J. Jansen Lumber Company and that he believes that process of garnishment against Robert R. Nahrung is necessary to obtain satisfaction of said claim, and that the said Robert R. Nahrung has or is believed to have in his possession or under his control money or effects belonging to the Defendant or that he is or is believed to be indebted to the Defendant or is liable to M. J. Jansen, Jr., on a contract for the delivery of personal property or is payable in personal property.

And further that the said M. J. Jansen, Sr., is over the age of 21 years, and is a non-resident; whose address is Erin, Tennessee, and further that the said M. J. Jansen, Sr., individually, and d/b/a M. J. Jansen Lumber Company was a resident of Alabama at the time the indebtedness sued on was incurred, in as much as the Defendant is a non-resident, Plaintiff has elected not to file a bond as provided under the 1940 Code of Alabama.



Sworn to and subscribed before me this 2 day of July, 1952.


Clerk of the Circuit Court of Baldwin County,
Alabama.

701823

RECORDED

FILED

JUL 2 1952

ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons M. J. Jansen, individually, and M. J. Jansen Lumber Company to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Ray E. Loper Lumber Company, a corporation.

Witness my hand, this 2nd day of July, 1952.

Deise J. Leach
CLERK

RAY E. LOPER LUMBER COMPANY, A CORPORATION, PLAINTIFF, VS. M. J. JANSEN, individually, and M. J. JANSEN LUMBER COMPANY, DEFENDANT.	 	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. AT LAW CASE NO. _____
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COUNT ONE: Plaintiff claims of the Defendant ONE THOUSAND FOUR HUNDRED FIVE and 47/100 (\$1,405.47) DOLLARS due from him by account on to-wit, the 18th day of March, 1952, which sum of money with interest thereon is still unpaid.

COUNT TWO: Plaintiff claims of the Defendant the sum of ONE THOUSAND FOUR HUNDRED FIVE and 47/100 (\$1,405.47) DOLLARS due from him by account on to-wit, the 18th day of March 1952, which sum of money with interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is attached hereto as Exhibit "A" and made a part thereof.

C. LeNoir Thompson
Tolbert M. Brantley
By: _____
Attorneys for Plaintiff

M 1823

RECORDED

FILED

JUL 2 1952

ALICE J. DUCK, Clerk

Exhibit "A"

S T A T E M E N T

RAY E. LOPER LUMBER COMPANY

Bay Minette, Ala., 3/18/52

M. J. Jansen Lumber Co.,
Fairhope, Ala.

		DR.	CR.
2/8/50	Invoice #643	\$567.41	
2/15/50	Invoice 667	539.50	
2/15/50	Invoice 671	551.51	
7/28/50	4,861 Rgh Green Lbr.		\$194.68
8/4/50	1,214 " " "		58.27
Balance		2,405.47	

STATE OF ALABAMA X

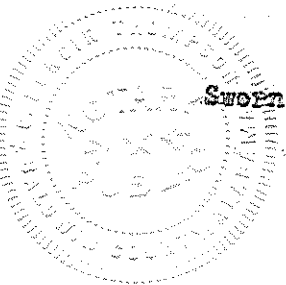
BALDWIN COUNTY X

Before me the undersigned authority in and for said county and state personally appeared Jack Sudduth, who is known to me and who having by me first been duly sworn deposes and says: That he is the Book-keeper for Ray E. Loper Lumber Company, a corporation, that he is familiar with the foregoing account and that the above stated account is a true and correct copy of the account rendered M. J. Jansen Lumber Company by Ray E. Loper Lumber Company, a corporation, on to-wit, the 18th day of March, 1952.

Jack Sudduth
Affiant

Sworn to and subscribed before me on the 1 day of July, 1952.

[Signature]
NOTARY PUBLIC

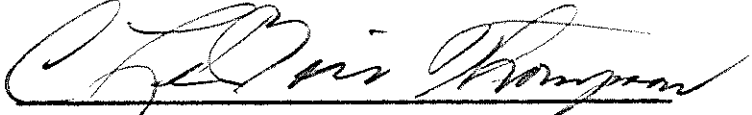


STATE OF ALABAMA §

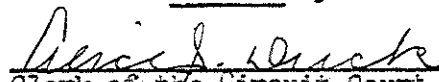
BALDWIN COUNTY §

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And further that the said M. J. Jansen, Sr., is over the age of 21 years, and is a non-resident; whose address is Erin, Tennessee, and further that the said M. J. Jansen, Sr., individually, and d/b/a M. J. Jansen Lumber Company was a resident of Alabama at the time the indebtedness sued on was incurred, in as much as the Defendant is a non-resident, Plaintiff has elected not to file a bod as provided under the 1940 Code of Alabama



Sworn to and subscribed before me this 2 day of July, 1952.


Clerk of the Circuit Court of Baldwin County,
Alabama.

1823
SUMMONS AND COMPLAINT

RAY E. LOFFER LUMBER COMPANY, A
CORPORATION,

PLAINTIFF,

VS.

M. J. JANSEN, individually, and
M. J. JANSEN LUMBER COMPANY,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. _____

FILED

7-2-22

Alice J. ...

CLERK

ALICE J. DUCK, Circuit Clerk

Baldwin County

BAY MINETTE, ALA.

1503-6281

RETURN RECEIPT REQUESTED

REASON CHECKED

Unclaimed Returned

Unknown

For better address

Moved. Left no address

No such office in state

Deliver to Addressee Only

M. J. Jansen,
Erin, Tennessee.

Registered
For Delivery Only To Person
To Whom Addressed

Return Receipt Requested

