

HERBERT C. ENGLAND, doing business as H. ENGLAND LUMBER COMPANY,

Plaintiff

vs

C. N. TAYLOR,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA


AT LAW

CASE NO.

1979

COUNT I. The plaintiff claims of the defendant the sum of Seventy-two Dollars and Sixty-nine Cents (\$72.69) due from him by account on, to-wit, July 30, 1951, which sum of money with the interest thereon is still unpaid. An itemized statement of account is attached hereto and made a part hereof.

COUNT II. Plaintiff claims of the defendant \$72.69 due from them for merchandise, goods and chattels sold by the plaintiff to the defendant on or before to-wit; the 30th day of July, 1951, which sum of money with the interest thereon is still unpaid. An itemized statement of account is attached hereto and made a part hereof.

  
FRED F. SMITH, JR.  
Attorney for Plaintiff

ADDRESS OF DEFENDANT:

C. N. Taylor  
Route 1 - Taylor's Place  
Robertsdale, Alabama

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 Dovard J. Long known to me, who being duly sworn, upon his oath stated he is General Manager for the 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 C. N. Taylor 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 C. N. Taylor 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 Seventy-two Dollars and Sixty-nine Cents (\$72.69) with interest from July 30, 1951, is justly due and remains unpaid.

Dovard J. Long  
Dovard J. Long

STATE OF ALABAMA |

Baldwin  
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 15th day of September 1952.

Grady P. Gilbert  
My Comm. expires 4/10/54

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 David J. Long known to me, who being duly sworn, upon his oath stated he is General Manager for the 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 C. W. Taylor 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 C. W. Taylor at the special instance and request of the doctor 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 Seventy-two Dollars and Sixty-nine Cents (\$72.69) with interest from July 30, 1951, is justly due and remains unpaid.

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 23 day of September, 1952.

*David J. Long*  
David J. Long  
Notary Public  
My Comm. Expires 11/1/54

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1979

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon C. N. Taylor

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

C. N. Taylor

, Defendant

by Herbert C. England, D/B/A H. England Lumber Company

, Plaintiff

Witness my hand this 1st day of May 19 53

Herbert C. England

, Clerk

No. 1979 Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

HERBERT C. ENGLAND d/b/a

H. ENGLAND LUMBER COMPANY

Plaintiffs

vs.

C. N. TAYLOR

Defendants

SUMMONS and COMPLAINT

Filed 5-1-19 553

*W. J. French*, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

May 2, 19 53  
*Taylor Wilkins*, Sheriff

I have executed this summons

this 7 May 19 53  
by leaving a copy with

*Mrs C. N. Taylor*

*Taylor Wilkins*, Sheriff

*Edleigh Steadham*, Deputy Sheriff

H. ENGLAND LUMBER CO.

SAW MILL AND RETAIL YARD

SAW MILL AND RETAIL YARD

ROBERTSDALE, ALA.

194

NAME \_\_\_\_\_

ADDRESS Robertsdale, Ala.

DESCRIPTION	FEET	PRICE	AMOUNT
50 yds. 4x8 Sheetrock	720	68.00	49.20
Sales Tax			.87
			49.07
Ticket # 14150			
Signed by:			
R.D. Lindsey			

H. ENGLAND LUMBER CO.

SAW MILL AND RETAIL YARD

SAW MILL AND RETAIL YARD

ROBERTSDALE, ALA.

194

NAME

ADDRESS \_\_\_\_\_

[illegible]

H. ENGLAND LUMBER CO.

PHONE 56  
SAW MILL AND RETAIL YARD

SAW MILL AND RETAIL YARD

ROBERTSDALE, ALA. 7-30-51 194

NAME C.N. Tayler

ADDRESS Robertsdale, Ala.

[illegible]

H. ENGLAND LUMBER CO.

PHONE 56  
SAW MILL AND RETAIL YARD

**SAW MILL AND RETAIL YARD**

ROBERTSDALE, ALA. 8-2-51 194

NAME C.N. Taylor

ADDRESS Robertsdale, Ala.

[illegible]

H. ENGLAND LUMBER CO.

**SAW MILL AND RETAIL YARD**

ROBERTSDALE, ALA. 7-30-51 194

NAME C.N. Taylor

ADDRESS Robertsdale, Ala.

[illegible]

H. ENGLAND LUMBER CO.

SAW MILL AND RETAIL YARD

ROBERTSDALE, ALA. 8-2-51 194

NAME C.N. Taylor

ADDRESS Robertsdale, Ala.

[illegible]



00 REGALY QVA-1079 .H

66-11000  
GRAY MATHEW OWEN JIM. WAS  
A BLACKPANO

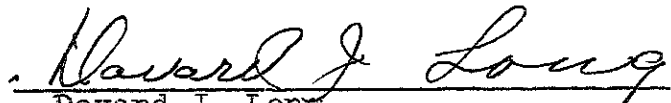
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STATE OF ALABAMA    ↓

COUNTY OF MOBILE   ↓

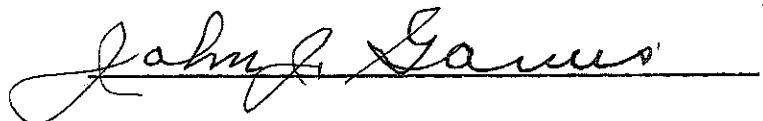
Before me, the undersigned authority in and for aforesaid County and State, who as a notary public under my seal of office is hereto attached, personally appeared Dovard J. Long known to me, who being duly sworn, upon his oath stated he is General Manager for the H. ENGLAND LUMBER COMPANY; that as such he makes this affidavit; that he is familiar with the books and business of H. ENGLAND LUMBER COMPANY; that the attached account against C. N. Taylor 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 C. N. Taylor 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 Seventy-two Dollars and Sixty-nine Cents (\$72.69) with interest from July 30, 1951, is justly due and remains unpaid.

  
Dovard J. Long

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 here- to affixed on this the 25 day of August, 1953.



My term expires on Monday after the  
second Tuesday in January, 1955.

FRED F. SMITH, JR.

ATTORNEY AT LAW

~~XXXXXX~~ 2 $\frac{1}{2}$  N. Wilson Ave.  
PRICHARD, ALA.

PHONE 6-7318

April 28, 1953

P. O. BOX 3422

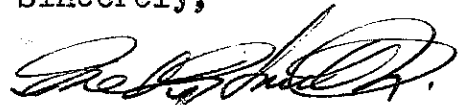
Mrs. Alice Duck  
Clerk of the Court  
Baldwin County Court House  
Bay Minette, Alabama

no 1979  
RE: Herbert C. England, d/b/a  
H. England Lumber Company  
vs  
C. N. Taylor

Dear Mrs. Duck:

Please file the enclosed case for me and  
let me know when any pleadings are filed or the case  
set for trial. Thank you for your attention to this  
matter.

Sincerely,



Fred F. Smith, Jr.

FFS/s  
encl

1979