HERBERT C. ENGLAND, do		IN THE CIRCUIT COURT OF
HODE OF E. MICHEMP HOR	Plaintiff	BALDWIN COUNTY, ALABAMA
vs	Į Laurio o Li	
C. N. TAYLOR,	Q	AT LAW
O. H. IMINOILY	Defendant (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 cath 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. ENGHAND 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 I COUNTY OF MODILE

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 State of leptecelery 52.

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STATE OF ALABAMA |

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STATE OF ALABAMA I

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 say of sealed level 252.

My Course effers Alacks

THE STATE OF ALABAMA, BALDWIN COUNTY	CIRCUIT COURT, BALDWIN COUNTY No. 1979
	TERM, 19
TO ANY SHERIFF OF THE STATE OF AL	
You Are Hereby Commanded to Summon C.	N. Taylor
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to appear and plead, answer or demur, within thir	ty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Ala	abama, at Bay Minette, against
C. N. Taylor	, Defendant
by Herbert C. England, D/B/A H	
	, Plaintiff
Witness my hand thislst	day of19 53
	A. A.

3 000	
No. 1979 Page	Defendant lives at
THE STATE OF ALABAMA	
BALDWIN COUNTY	
CIRCUIT COURT	RECEIVED IN OFFICE
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Plaintiffs vs.	7 7/2 5/3
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C. N. TAYLOR	by leaving a copy with
	Mrs C. n. Daylor
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Defendants	
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Plaintiff's Attorney	1. 1. 1. 1. 1. 1.
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Defendant's Attorney	£ 10: 1 14 00
Desendant's Attorney	- 6 aleegn SteathamDeputy Sheriff

H. ENGLAND LUMBER CO.

NAME	32	Charles Am	· .	
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H. ENGLAND LUMBER CO.

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SAW MILL AND RETAIL YARD
ROBERTSDALE, ALA. 194

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H. ENGLAND LUMBER CO.

phone 56
SAW MILL AND RETAIL YARD
ROBERTSDALE, ALA. 7-30-51 19

NAME	C.N.	Taylor	·	

ADDRESS Robertsdele, als.

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H. ENGLAND LUMBER CO.

saw mill and retail yard ROBERTSDALE, ALA. 8=2=51 194

NAME C	N. Taylor		•	 ·	<u> </u>	
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H. ENGLAND LUMBER CO.

PHONE 56
SAW MILL AND RETAIL YARD ROBERTSDALE, ALA

7-30-51

C.N. Taylor

Robertsdale. Ala.

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SAW MILL AND RETAIL YARD ROBERTSDALE, ALA. 8-2-51

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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.

· Ward J. Long

John Games

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 day of August, 1953.

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

FRED F. SMITH, JR.

ATTORNEY AT LAW

EXAMPLE 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

201979

RE: Herbert C. England, d/b/a H. England Lumber Company

٧s

C. N. Taylor

Filed 571-50

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

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