

RICHARD C. LACEY
Attorney-At-Law
FAIRHOPE, ALABAMA 36532

September 15, 1969

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

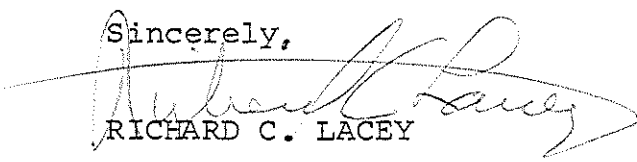
Modern Welding and Track Serv. Co., Inc.
vs. Floyd L. Smith

8887

Dear Mrs. Duck:

I have enclosed summons and complaint in subject matter and would appreciate your placing it before Sheriff Wilkins for service. Thank you.

Sincerely,


RICHARD C. LACEY

RCL/dt
encls.

MODERN WELDING AND TRACK SERVICE)
COMPANY, INC., a corporation,

Plaintiff,

VS:

FLOYD L. SMITH,

Defendant

IN THE CIRCUIT COURT

OF BALDWIN COUNTY, ALABAMA

AT LAW

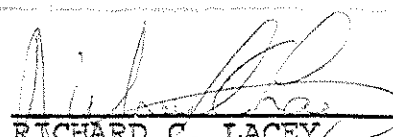
CASE NO. _____

BILL OF COMPLAINT

The Plaintiff claims of the Defendant SIX HUNDRED THIRTY-TWO and 09/100 (\$632.09) DOLLARS, due from him on account, to-wit; the 23rd day of May, 1968, which sum of money with the interest thereon is still unpaid.

II

The Plaintiff claims of the Defendant SIX HUNDRED THIRTY-TWO and 09/100 (\$632.09) DOLLARS, due from him for merchandis, goods and chattels sold by the Plaintiff to the Defendant on to-wit: the 23rd day of May, 1968, which sum of money with the interest thereon is still unpaid.


RICHARD C. LACEY
Atty. for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereto, an itemized statement of account verified by Harold E. Landrum, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 23rd day of May, 1968.

Defendant may be serviced at
Rt. 1, Robertsedale, Alabama

FILED

SEP 19 1969

ALICE J. DUCK

CLERK
REGISTER

MODERN WELDING AND TRUCK SERVICE)
 COMPANY, INC., a corporation,)
 Plaintiff,)
 VS:)
 FLOYD L. SMITH,)
 Defendant)
 AT LAW)
 CASE NO.)
 IN THE CIRCUIT COURT)
 OF BALDWIN COUNTY, ALABAMA)

WILL OF COMPLAINT

The Plaintiff claims of the Defendant SIX HUNDRED THIRTY-TWO
 and 09/100 (\$632.09) DOLLARS, due from him on account, to-wit:
 the 3rd day of May, 1968, which sum of money with the interest
 thereon is still unpaid.

II

The Plaintiff claims of the Defendant SIX HUNDRED THIRTY-TWO
 and 09/100 (\$632.09) DOLLARS, due from him for merchandise, goods
 and chattels sold by the Plaintiff to the Defendant on to-wit:
 the 3rd day of May, 1968, which sum of money with the interest
 thereon is still unpaid.

RICHARD C. LACEY
 Atty. for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereto,
 an itemized statement of account verified by Harold E. Langrum,
 a competent witness, sworn to before a Notary Public, which
 statement shows the amount due on this account as of the 3rd
 day of May, 1968.

Defendant may be served at
 Rt. 1, Robertsdale, Alabama

FILED

SEP 19 1968

CLERK
REGISTER

ALICE J. DUCK

SEP 19 1968

ALICE J. DUCK
 CLERK
 REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8887

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Floyd L. Smith

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.....

Floyd L. Smith....., Defendant.....

by Modern Welding and Track Service Company, Inc.

....., Plaintiff.....

Witness my hand this 19 day of Sept 1969

Alice J. Week Clerk

No. 8887 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Modern Welding and

Trucks Service Co. Inc.

Plaintiffs

vs.

Floyd L. Smith

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

..... Clerk

..... Plaintiff's Attorney

..... Defendant's Attorney

Defendant lives at

Received In Office

Sept. 19, 1969

..... Sheriff

I have executed this summons

this Oct 1, 1969

by leaving a copy with

Floyd L. Smith

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY

Hall
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Hall Deputy Sheriff

Lidah 50 mi