

SUMMONS

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

2150

TO ANY SHERIFF OF THE STATE OF ALABAMA, - GREETING:

YOU ARE HEREBY COMMANDED to summon LOUIS CARNELY 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 LOUIS CARNELY, by REYNOLDS BROTHERS LUMBER CO., a partnership composed of J. P. REYNOLDS and M. S. REYNOLDS.

Witness my hand this the 18th day of December, 1953.

Dee J. Vercia  
Clerk

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COMPLAINT

REYNOLDS BROTHERS LUMBER CO.,  
a Partnership composed of  
J. P. REYNOLDS and M. S.  
REYNOLDS,

Plaintiff

vs:

LOUIS CARNELY,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY SIX & 98/100 DOLLARS (\$336.98), together with interest thereon, due from him by account on, to wit: the 15th day of December, 1953, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY SIX & 98/100 DOLLARS (\$336.98), together with interest thereon, due from him by account stated between the Plaintiff and the Defendant on, to wit: the 15th day of December, 1953, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY SIX & 98/100 DOLLARS (\$336.98), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 15th day of December, 1953, which sum of money, with interest thereon, is still unpaid.

Wm H. Christ  
Attorney for Plaintiff

There is attached to the original hereof and made a part of this suit, an itemized statement of account, sworn to by the bookkeeper of the plaintiff before a notary public, showing the amount due on this account as of the 15th day of December, 1953.

The defendant's address is Fairhope, Alabama.

lives in Town of Fairhope.

Warren's Paints  
1822 Colors

J. P. and M. S. REYNOLDS

Kentile  
Floor Covering

Statement  
In Account With

# Reynolds Brothers Lumber Co.

Foley, Ala., 12-15 1953

M LOUIS CARNELY

FAIRHOPE, ALA.

## READY-MIX CONCRETE

Brick - Tile - Plumbing Supplies - Hardware - Electrical Supplies

PHONE 157

All Bills MUST Be Paid By 10th

P. O. BOX 855

Date	Invoice No.	Debit	Credit	Balance
3-7-53	8555	174.26		
3-10-53	8636	46.37		
3-10-53	8632	166.95		
3-11-53	8774	2.28		
3-11-53	8667	247		
3-13-53	8757	35.86		
3-16-53	8807	80.68		
3-17-53	8839	58.71		
3-25-53	9080	81.71		
3-30-53	9226 CM		11.49	
3-30-53	9225	21.51		
4-29-53	1268	486.7		
		686.98		
	Less Cash		350.00	
				336.98

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

ROY CLIPPER, first being duly sworn, deposes  
and says as follows:

My name is Roy Clipper; I am the bookkeeper  
for Reynolds Brothers Lumber Co., a partnership composed  
of J. P. Reynolds and M. S. Reynolds, and I do certify  
that the itemized statement of account shown on the  
reverse side hereof is a true and correct statement of  
account due Reynolds Brothers Lumber Co. after allowing  
all due credits, and that Louis Garnley owes a balance  
of \$336.98 as of this date.

Roy Clipper  
Affiant

Sworn to and subscribed before me,  
a Notary Public in and for Baldwin  
County, Alabama, this the 18th day  
of December, 1953.

Notary Public

162

Reynolds Brothers Lumber Co.

1953

NOTARY PUBLIC

NOTARY PUBLIC

NOTARY PUBLIC

RECORDED *no 2152*

*12/30* 1953  
by serving copy of within Summons and  
Complaint on

*Louis Carnely*  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*Taylor Wilkins* Sheriff  
*H. Hall* Deputy Sheriff

SUMMONS AND COMPLAINT

REYNOLDS BROTHERS LUMBER CO.  
A Partnership composed of  
J. P. REYNOLDS & M. S. REYNOLDS,

PLAINTIFF

VS:

LOUIS CARNELY,

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

FILED  
DEC 18 1953  
JUDGE J. BROWN, CLERK

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA