

Our File No. 70-22

Your File No.

Law Offices

E. G. RICKARBY
35 SOUTH SECTION STREET
FAIRHOPE, ALABAMA 36532

Code 205
Telephone: 928-9836

Mailing Address
P.O. Box 471

1 October, 1970

Honorable Telfair J. Mashburn
Circuit Judge, Baldwin County
Bay Minette, Alabama

INRE: FAIRHOPE TITLE & SURVEY CO.,
VS. WOODROW NETTLES - CASE NO. 9260: AT LAW:

Dear Judge Mashburn:

Request that you render Judgment by default in the above styled cause, on the original complaint, and itemized and verified statement of account for Four Hundred Five Dollars and Four Cents (\$405.04), Three hundred Seventy Five Dollars and Four Cents (\$375.04) principal, Thirty Dollars (\$30.00) interest.

Personal service was obtained on Mr. Nettles on 27 May, 1970.

Respectfully,


Daniel A. Benton

DAB:jmp

STATE OF ALABAMA,
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY.
NO. _____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon WOODROW NETTLES 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 WOODROW NETTLES, defendant, by FAIRHOPE TITLE & SURVEY COMPANY, INC., Plaintiff.

WITNESS my hand this 18 day of May, 1970.

Alice J. Duck
ALICE J. DUCK, Clerk.

FAIRHOPE TITLE & SURVEY COMPANY, INCX

Plaintiff,

VERSUS

WOODROW NETTLES,

Defendant.

X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA
X AT LAW.
X 9260

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant THREE HUNDRED SEVENTY-FIVE AND NO/100 (\$375.00) DOLLARS due from him by account, on, to-wit, the 29th day of April, 1970, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

Count II.

The plaintiff claims of the Defendant the sum of THREE HUNDRED SEVENTY-FIVE AND NO/100 (\$375.00) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 29th day of April, 1970, which sum of money with the interest thereon is still unpaid.

Count III.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED SEVENTY-FIVE AND NO/100 (\$375.00) DOLLARS due from him for professional

Page 2, Two Pages - Summons & Complaint
Fairhope Title & Survey Co., vs. Woodrow Nettles.

engineering services rendered to the Defendant by the Plaintiff on,
to-wit, the 16th day of April, 1969, which sum of money with the inter-
est thereon is still unpaid.



E. G. RICKABY,
Attorney for Plaintiff.

Defendant resides at:

Van Avenue
Daphne, Alabama 36526

STATE OF ALABAMA,
COUNTY OF BALDWIN.

Before me, the undersigned Notary Public, in and for said County, in said State, personally appeared C. W. ARNOLD, who being first duly sworn, deposes and says that he is President of FAIRHOPE TITLE & SURVEY COMPANY, INC., which is a Corporation.

That as such President, affiant has knowledge of the account owed to FAIRHOPE TITLE & SURVEY COMPANY, INC., by _____ Woodrow Nettles _____, who is an individual.

That the attached itemized statement is a true and correct statement of the account owed by Woodrow Nettles _____ to FAIRHOPE TITLE & SURVEY COMPANY, INC.,

That there is now owing by Woodrow Nettles _____ the sum of Three hundred seventy five and No/100 ----- DOLLARS, with interest from the 16th day of April, 19 69, after allowing all credits.

Candi W. Arnold
Affiant

Subscribed and sworn to before me
this the 29th day of April,
1970.

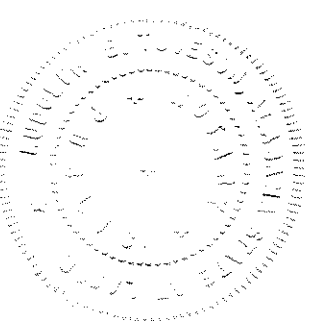
Rudolph E. Tresson
Notary Public, Baldwin County,
Alabama.

FILED

MAY 18 1970

ALICE J. DUCK CLERK
REGISTER

My Commission Expires June 14, 1973



FAIRHOPE TITLE & SURVEY CO., INC.

P. O. BOX 502

FAIRHOPE, ALABAMA

MISS DIAN STITT, SECRETARY
TEL. 928-9163

CLAUDE W. ARNOLD
ENGINEER

R. B. WELKER

GARY THOMAS
SURVEYORS

J. H. ARNOLD
GRACE A. KING
ABTRACTOR

April 29, 1970

STATEMENT OF ACCOUNT: Woodrow Nettles.

Statement rendered April 16, 1969

Invoice Number 5391....

-To- Survey work performed at Mount Vernon, regarding
various properties and houses and other related work.

	\$350.00
-To- Prepare Deed, Nettles to Nettles.	25.00
TOTAL DUE	<u>\$375.00.</u>

No. 4260

Far hope Title & Survey Co.

memo
5/22/70

OS.

Woodrow Nettles
VAN Ave.
DAPHNE, ALA.

FILED

MAY 18 1970

ALICE J. DUCK

CLERK
REGISTER

F. G. R.

Received 18 day of May 1970
and on 27 day of May 1970
I served a copy of the within on
Woodrow Nettles
Woodrow Nettles
By service on
TAYLOR WILKINS, JR. OFF
BY W. G. R. - 54 miles