

PAUL DOWSEY, individually and X
doing business as DOWSEY
HEATING & AIR-CONDITIONING, X

IN THE CIRCUIT COURT OF

Plaintiff, X

BALDWIN COUNTY, ALABAMA

vs. X

AT LAW

RICHARD A. SIBLEY, X

Defendant. X

PLEA

Comes now the Defendant in the above styled cause, by
and through his Attorneys of Record, and for plea to the Complaint
heretofore filed in said cause says separately and severally as
follows:

1. The allegations of the Complaint are untrue.

CHASON, STONE & CHASON

By: John E. Chason

Defendant respectfully demands trial
of this cause by a jury.

CHASON, STONE & CHASON

By: John E. Chason

FILED

JUL 15 1970

ALICE J. DUCK CLERK
REGISTER

THE UNIVERSITY OF CHICAGO

PHYSICS DEPARTMENT

CHICAGO, ILL.

SEPTEMBER 10, 1937

PROF. J. H. P. [illegible]

UNIVERSITY OF CHICAGO

CHICAGO, ILL.

SEPTEMBER 10, 1937

DEAR [illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

9328

Lucy

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck
Bay Minette, Ala.

DATE June 10, 1970

Re: Paul Dowsey vs. Richard A. Sibley

Dear Mrs. Duck:

Enclosed please find Bill of Complaint
to be filed, together with copy of same
and summons to be served.

Sincerely,

John V. Duck
CJS

SIGNED

DATE

9328

SIGNED

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE

DATE July 1, 1970

Re: Paul Dowsey, dba Dowsey Heating and
Air-Conditioning vs. Richard A. Sibley

Dear Mrs. Duck:

I understand from the Deputy Sheriff that
Mr. Sibley has moved from Spanish Ford.

Would you please try and have him served
at HOFHEINS & TRICE, CPA, 320 S. Sage Ave.,
Mobile, Ala., his place of employment.

Sincerely,

SIGNED

SIGNED

PAUL DOWSEY, individually and
doing business as DOWSEY HEATING
& AIR-CONDITIONING,

Plaintiff,

vs.

RICHARD A. SIBLEY,

Defendant.

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA

) AT LAW

) 9328

COUNT ONE

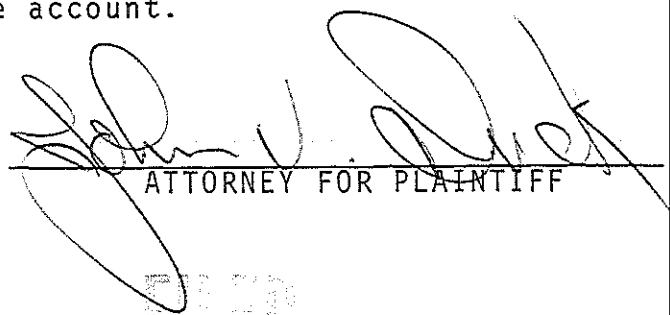
Plaintiff claims of the Defendant the sum of THREE HUNDRED FIFTY-ONE AND 98/100 (\$351.98) DOLLARS due from him by open account on, to-wit: the 5th day of June, 1970, which sum of money with the interest thereon is still unpaid.

COUNT TWO

Plaintiff claims of the Defendant the sum of THREE HUNDRED FIFTY-ONE AND 98/100 (\$351.98) DOLLARS due from him by account stated from on, to-wit: the 5th day of June, 1970, which sum of money with the interest thereon is still unpaid.


ATTORNEY FOR PLAINTIFF

Note: The account sued on is hereby evidenced by an itemized and verified statement of the account.


ATTORNEY FOR PLAINTIFF

FILED

JUN 12 1970

ALICE J. BOON CLERK
REGISTER

State of Alabama,
County of Mobile.

Before me, the undersigned authority, on this day personally appeared PAUL DOWSEY, known to me, who being duly sworn, upon his oath states that the attached account in favor of DOWSEY HEATING & AIR CONDITIONING; and against RICHARD A. SIBLEY in the sum of \$351.98 is correct and just; that payment thereof is due and has not been received; that credit has been duly given for all payments and just and lawful offsets to which said account is entitled; that he has personal knowledge of said facts, and that he is duly authorized to make affidavit thereto.

Paul Dowsey

Sworn to and subscribed before
me this 10 day of June,
1970.

Lucia Highes
Notary Public in and for Mobile,
County, Alabama. *Sullivan*

PHONE 928-5566 & 928-5777

DOWSEY HEATING AND AIR CONDITIONING

SOUND VALUE IN HEATING AND AIR CONDITIONING

55 NORTH SECTION STREET

FAIRHOPE, ALABAMA 36532

6/5/ 19 70

Mr. & Mrs. R. A. Sibley

P. O. Box 434

Spanish Fort, Ala. 36527

6/5/70

As per Invoice #6868-6869

\$351.98

THANK YOU

— NEW LOCATION —
458 NORTH SECTION STREET
FAIRHOPE, ALABAMA 36532
928-5566 — 928-5777

DOWSEY HEATING AND AIR CONDITIONING COMPANY

SOUND VALUE IN HEATING AND AIR CONDITIONING

For and in consideration of the credit extended to me, I the undersigned, on demand, hereby promise to pay to Dowsey Heating and Air Conditioning the face amount hereon, & do hereby waive as to the debt arising out of the credit transactions as itemized, all my rights of exemption to personal property authorized by the Constitution and Laws of Alabama, or any other State, and I agree to pay all costs of collecting or attempts to collect the amounts stated in the indebtedness, including a reasonable attorney's fee, whether suit be necessary or otherwise.

55 N. SECTION ST.

FAIRHOPE, ALA.

O.O. Ref. 434
928-5566

Customer's

Order No.

Date

Name

Mr. & Mrs. R. A. Sibley

Address

Terry Street, Wilson Heights
Shawnee Trail, Ala. 36527

SOLO BY	CASH	C.O.D.	CHARGE	ON ACCT.	MOSE. RETD.	PAID OUT

QUAN.	DESCRIPTION	PRICE	AMOUNT
	Charge out for labor and material expended in your behalf towards installation of Central Air Conditioning equipment. Mr. Sibley instructed workmen to leave her premises.		
1	12 H.P. Evaporator Coil and casing	# 066585	115.00
45'	3/4" tubing		38.00
45'	3/8" tubing		18.00
1	Evaporator light light switch		11.25
1	Dead - Cool Thermostat		19.55
	Associated wiring & conduit		12.50

GS 58 All claims and returned goods MUST be accompanied by this bill.

6868

RECEIVED
BY

TAX

TOTAL

SOUND VALUE IN HEATING AND AIR CONDITIONING

55 N. SECTION ST.

928-5566

Date _____

6/5 19 70

Name

Address

SOLD BY

CASH

C.O.D

CHARGE

ON AGCT

MOSE BELO

PAID OUT

QUAN.

DESCRIPTION

PRICE

AMOUNT

	DESCRIPTION
1	Drain Hose, Truck and three (3) men on job one (1) day

325

12500

65 38

All claims and returned goods **MUST** be accompanied by this bill.

6869

RECEIVED
BY

TAX,

TOTAL

873

351.98

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No.

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon RICHARD A. SIBLEY

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.....

RICHARD A. SIBLEY

....., Defendant.....

by PAUL DOWSEY, Ind. & dba DOWSEY HEATING & AIR CONDITIONING

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

Witness my hand this 12 day of

June 1970

Alice J. Luck
Clerk

9328

8215

No. Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

PAUL DOWSEY, Ind. & dba

DOWSEY HEATING & AIR CONDITIONING

Plaintiffs

vs.

RICHARD A. SIBLEY

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

ALICE J. BECK
CLERK
REGISTER

SUBJECT IS DIVORCED
AND HE AND HIS WIFE
NO LONGER LIVE AT THIS
ADDRESS

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Terry Street, Wilson Heights
Spanish Fort, Ala.

Received In Office

June 12 1970

Naylor Wilkins Sheriff

I have executed this summons

this July 10 1970

by leaving a copy with

Richard Sibley

Ray L. Bridges Sheriff

By J. W. Layton D.S.

Sheriff clerk

Ten Cents

WILKINS

DEPUTY SHERIFF

clerk

search and

1970

Sheriff

Deputy Sheriff