

RALPH FAGEN,  
Plaintiff

-vs-

CAROLYN JAYE and  
GENE JAYE, jointly  
and individually,  
Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW.  
CASE NO. 9378

COMPLAINT

The Plaintiff claims of the Defendants the sum of  
SIX THOUSAND ONE HUNDRED THIRTY-NINE AND 50/100 (\$6,139.50)  
DOLLARS due from them for merchandise, goods, and chattels  
sold by the Plaintiff to the Defendants on, to-wit:  
June 24, 1970, which sum of money, with the interest thereon,  
is still unpaid.

SIMON AND WOOD

By: James C. Wood  
James C. Wood  
1010 Van Antwerp Bldg.,  
Mobile, Alabama 36602

Defendants address:

Bon Secour, Alabama

FILED

JUL 10 1970

ALICE J. DUCK

CLERK  
REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9378

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CAROLYN JAYE & GENE JAYE, Jointly & Individually

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.....

Carolyn Jaye & Gene Jaye, Jointly & Individually .. Defendant.....

by Ralph Fagen

..... Plaintiff.....

Witness my hand this.....10th.....day of.....July.....1970.....

*Alice J. Luck* Clerk

24 7-15-70

No. 9378

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**THE STATE OF ALABAMA**

**BALDWIN COUNTY**

**CIRCUIT COURT**

RALPH FAGEN,

Plaintiffs

vs.

CAROLYN JAYE & GENE JAYE,  
Jointly & Ind.

Defendants

**SUMMONS AND COMPLAINT**

Filed July 10, 1970

Alice J. Duck Clerk

Simon & Wood

1010 Van Antwerp Bldg.  
Mobile, Ala. Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
Bon Secour or Rt. 2, Foley

Received In Office

July 14 1970  
Taylor Wilkins Sheriff

I have executed this summons

this July 15 1970  
by leaving a copy with

Carolyn Jaye  
Gene Jaye

17.7 miles at  
Sheriff's claim

Ten Cents per mile. Total \$17.20

TAYLOR WILKINS, Sheriff

BY [Signature] DEPUTY SHERIFF

Taylor Wilkins Sheriff  
[Signature] Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

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*Law Offices*

SIMON & WOOD

433-4904

*Suite 1010 Van Antwerp Building  
Mobile, Alabama 36602*

March 17, 1971

Mrs. Eunice B. Blackmon, Clerk  
Baldwin County Circuit Court  
Courthouse  
Bay Minette, Alabama

Re: Ralph Fagen v. Carolyn & Gene Jaye  
Case No. 9378

Dear Mrs. Blackmon:

The above referenced case was set in your court on March 11, 1971. I was out of town and unable to be in court, but I understand the Judge postponed the case at that time. Since the defendants have never filed an answer in this matter, would you please enter a default judgment for me with leave to prove damages at a later date. My client lives in Louisiana and as soon as I can get him to come over this way we would be able to complete our case.

Thank you very much for your assistance and cooperation in this matter.

Yours truly,

SIMON AND WOOD

*James C. Wood*

James C. Wood

JCW:egw

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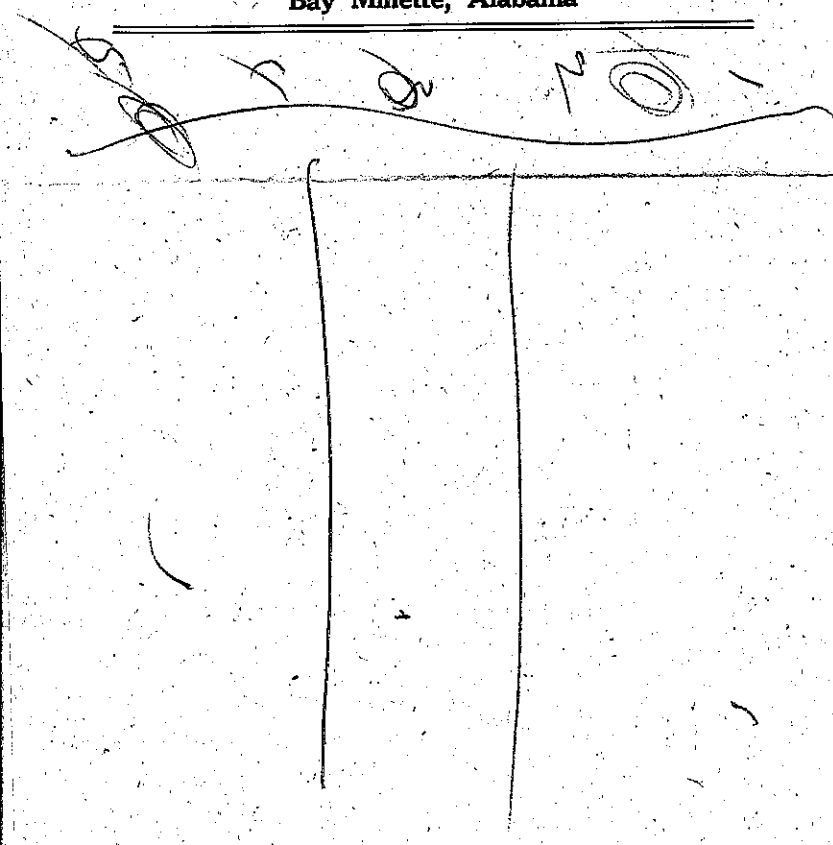
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Cb. I

~~to accept~~

Service

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