

Daniel E. Robison

ATTORNEY AT LAW

P. O. Box 794  
PHONE 943-4955

117 So. Alston Street  
FOLEY, ALABAMA 36535

November 16, 1971

Mrs. Eunice Blackmon  
Register of the Court, at Law  
Bay Minette, Alabama

RE: John Edwards vs. Gene Jaye  
No. 10,069

Dear Eunice:

The Defendant was served on October 15, 1971, and 30 days have passed without an answer by him.

Enclosed is a verified account. Interest from the last entry, at 6%, from June 30, 1970, is \$27.05. Together with the principal, of \$338.08, we ask for default judgment in the amount of \$365.13. Please give this file to the Judge.

Very truly yours,

*Daniel E. Robison*

Daniel E. Robison

DER/meh

STATE OF ALABAMA )

BALDWIN COUNTY )

VERIFICATION OF ACCOUNT

Before me, the undersigned authority on this day personally appeared JOHN E. EDWARDS known to me, who being by me duly sworn states on oath that the foregoing and John Edwards, d/b/a Edwards annexed account in favor of Electrical Service against Gene Jaye, d/b/a Bon Secour Shellfish for the sum of \$338.08

is within the knowledge of affiant, just and true; that it is due and unpaid and that all lawful offers, payments and credits have been allowed.

John E. Edwards  
Affiant

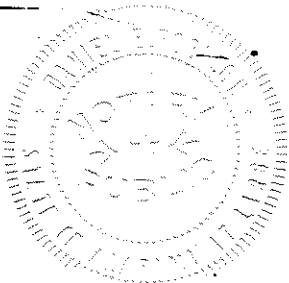
Subscribed and sworn to before me this 17 day of

November . . . 1971.

Daniel E. Robinson  
Notary Public

My Comm. Expires

January 23, 1975





# Edwards Electric Motor Service

A COMPLETE ELECTRIC MOTOR REPAIR SERVICE & CONTROLS

LET YOUR ELECTRIC TROUBLES BE OURS

M Bon Secan Shellfish  
% Gene Jage  
Bon Secan, Ala.

417 S. ALSTON ST.

JOHN E. EDWARDS  
 24 HOUR SERVICE

DAY PHONE 943-7551  
 NIGHT PHONE 943-7603

3/31/70	#0609	Wire Oyster Bon			
		at Gulf & Legat fifteen			270.00
4/15/70	#0625	outside light at			
		Oyster Bon at Gulf			33.94
4/20/70	#0632	Service Calls labor			12.00
4/24/70	#0638	" " "			19.00
4/29/70	#0651	S. Call, Parts + labor			25.00
4/30/70	#0655	move cooler Parts + labor			78.65
5/9/70	#0675	Revised Oyster clasp			307.59
5/16/70	#0667	S. Call + labor			20.00
6/16/70	#0771	S. Call, Parts + labor			24.40
					790.58
		Pd. by check # <del>3484</del> - <del>4/30/70</del>			<del>150.00</del>
		1-21-70			640.58
		Pd. check #3484 - 5/8/70			300.00
					340.58
		6/30/70 check #3484 Returned			640.58
		Pd. wire check			302.50
					338.08
		Bal. →			

STATE OF ALABAMA )  
BALDWIN COUNTY ) TO ANY SHERIFF OF THE STATE OF ALABAMA

You are hereby commanded to summon GENE JAYE, d/b/a Bon Secour Shellfish, Box 106, Bon Secour, Alabama, or at Wallace Seafood, Bon Secour, Alabama, to appear within thirty days after the service of this summons in the Circuit Court to be held for said County, then and there to demur or plead to the complaint of John Edwards, d/b/a Edwards Electrical Service.

Witness my hand this ...11... day of Oct....., 1971.

*Eunice B. Blackmon*  
Clerk

\* \* \* \* \*

JOHN EDWARDS, d/b/a	)	
EDWARDS ELECTRICAL SERVICE	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW
GENE JAYE, d/b/a	)	NO <u>10,069</u>
BON SECOUR SHELLFISH CO.,	)	
Defendant	)	

COMPLAINT

The Plaintiff, John Edwards, d/b/a Edwards Electrical Service claims of the Defendant, Gene Jaye, d/b/a Bon Secour Shellfish Co., Three Hundred, Thirty-Eight Dollars and 08/100ths (\$338.08), due from the Defendant by account from the 7th of July, 1971, which sum of money with interest thereon is still unpaid.

*Daniel E. Robison*  
Daniel E. Robison  
Attorney for Plaintiff

**FILED**

OCT 11 1971

EUNICE B. BLACKMON  
CIRCUIT CLERK

presented 11 day of Oct 71  
and on 13 day of Oct 71  
I served a copy of the within  
on Dene Jaye  
By service on \_\_\_\_\_

Sheriff claims 84 miles at  
Ten Cents per mile Total \$ 8.40  
TAYLOR WILKINS, Sheriff  
BY [Signature]  
DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff  
[Signature] D. S.

Case 10,069

John Edwards, d/b/a  
Edwards Electrical  
Service  
vs.  
Dene Jaye, d/b/a  
Bon Secours Shellfish  
Co.

FILED

OCT 11 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

OCT 11 1971

TAYLOR WILKINS  
SHERIFF

Daniel E. Robison