

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 Co., 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 Leon Alms, Warren Alms, d/b/a Alms Pump Service.

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

Eunice B. Blackmon
Clerk

* * * * *

LEON ALMS,)
WARREN ALMS, d/b/a) IN THE CIRCUIT COURT OF
ALMS PUMP SERVICE) BALDWIN COUNTY, ALABAMA
Plaintiffs) AT LAW
vs.) NO 10,020
GENE JAYE, d/b/a)
BON SECOUR SHELLFISH CO.,)
Defendant)

COMPLAINT

The Plaintiffs, Leon Alms and Warren Alms, d/b/a Alms Pump Service claims of the Defendant, Gene Jaye, d/b/a Bon Secour Shellfish Co., One Hundred, Ninty Dollars and 61/100ths (\$190.61), due from the Defendant by account from the 2nd of May, 1970, which sum of money with interest thereon is still unpaid.

Daniel E. Robison
Daniel E. Robison
Attorney for Plaintiffs

FILED

OCT 11 1971

EUNICE B. BLACKMON
CIRCUIT CLERK

Received 11 day of Oct 71
and on 15 day of Oct 71
I served a copy of the within
on Gene Jaye

By service on _____

TAYLOR WILKINS, Sheriff
By Donna Blackmon

Sheriff claims 86
Ten Cows per mile Total \$ 860
TAYLOR WILKINS, Sheriff
By Donna Blackmon
DEPUTY SHERIFF

CASE NO. 10,070

LEON ALMS, WARREN ALMS, d/b/a
AIMS PUMP SERVICE

VS:

GENE JAYE, d/b/a*
BON SECOUR SHELLFISH CO.

OCT 11 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

OCT 11 1971

TAYLOR WILKINS
SHERIFF

DANIEL E. ROBISON

Daniel E. Robison

P. O. Box 794
PHONE 943-4955

ATTORNEY AT LAW

117 So. Alston Street
FOLEY, ALABAMA 36535

November 16, 1971

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

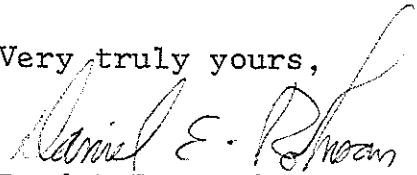
RE: Leon Alms, Warren Alms vs. Gene Jaye
No. 10,070

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 May 2, 1970, is \$17.15. Together with the principal, of \$190.61, we ask for default judgment in the amount of \$207.76. Please give this file to the Judge.

Very truly yours,


Daniel E. Robison

DER/meh

STATE OF ALABAMA)

BALDWIN COUNTY)

VERIFICATION OF ACCOUNT

Before me, the undersigned authority on this day personally appeared MRS. LEON ALMS known to me, who being by me duly sworn states on oath that the foregoing and Leon Alms, Warren Alms, d/b/a annexed account, in favor of Alms Pump Service against Gene Jaye, d/b/a Bon Secour Shellfish for the sum of \$190.61 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.

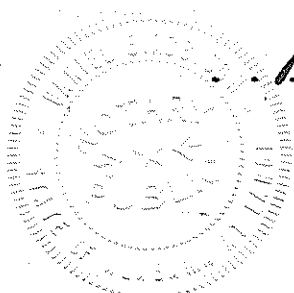
Mrs. Leon Alms.
Affiant

Subscribed and sworn to before me this , 16 . . day of

November . . . 19 71.

Daniel E. Phisom
Notary Public

My Commission Expires
January 23, 1975



Carson Printing Co., Foley