

CHARLES SANKS, individually,
and d/b/a SANKS CONSTRUCTION
COMPANY,

Plaintiff,

vs.

WILLIAM E. FURLOW and MARY G.
FURLOW,

Defendants.

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IN THE CIRCUIT COURT OF

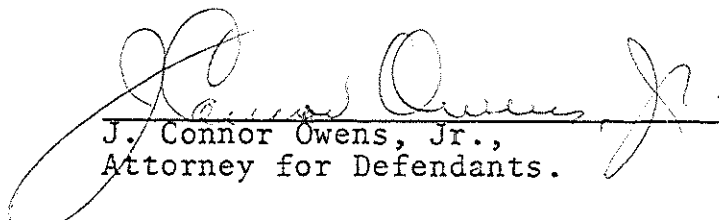
BALDWIN COUNTY, ALABAMA

AT LAW. NO. 10,584

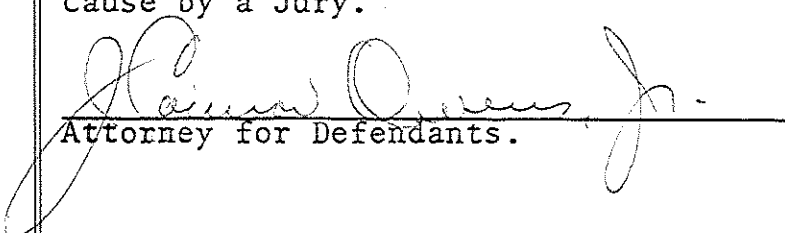
ANSWER:

Now come the Defendants in the above styled cause and for
answer to the complaint heretofore filed against them, say:

1. Not guilty.
2. The allegations of the complaint are untrue.


J. Connor Owens, Jr.,
Attorney for Defendants.

Defendants demand a trial of this
cause by a Jury.


Attorney for Defendants.

I, the undersigned, Attorney of Record for the Defendants in
the foregoing cause, do hereby certify that I have caused a copy
of the foregoing answer to be served on E. E. Ball, the Attorney
of Record for the Plaintiff in said cause, by placing the same in
the United States Mail, properly addressed, with postage prepaid,
this 13th day of September, 1972.

FILED

SEP 14 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

70-1637

JURY LIST - JULY CIVIL TERM- JULY 9, 1973

Jacks
vs.
Furlow

- ~~1. Morris, Robert E., Civil Service, Box 655, Foley, Ala., Pensacola, Fla.~~
- ~~2. Havens, Norman P., Clerk L&N RR 817 Van Av. Daphne, Mobile~~
- ~~3. Johnson, Claude, Ala. Hwy. Dept. 201 Dickman Rd. Bay Minette, Bay Minette~~ D6
- ~~4. Evan, Willie Nell, School Bus Driver, Lillian Ala~~ D10
- ~~5. Thompson, Albert M., Merchant, 600 E. 9th St. Bay Minette~~ P3
- ~~6. Harris, Willie Jr., Janitor, 1209 Pecan St. Bay Minette, Courthouse~~
- ~~7. Dale, Percy, Mgr. Night Club, 618 Young St. Fairhope~~ D11
- ~~8. Davis, Richard M., Insp. St. Hwy Dept. 813 Prospect Av. Fairhope~~ P9
- ~~9. Emmons, Mary Maude, Florist, 311 E. 11th St. Bay Minette~~ D7
- ~~10. Brooks, Mamie, Counsilor Little River, CA P. O. Box 741 Foley, Foley~~ D12
- ~~11. Clark, J. W., Feed Store, P. O. Box 523, Robertsedale, Robertsedale~~
- ~~12. Shivers, James D., Polpwood, Rt. 2 Bay Minette~~ P1
- ~~13. Cabiness, Betty J., Dept. Mgr. Baldwin Lanes Old Carney Rd. Bay Minette~~ D3
- ~~14. Sims, James F., Farmer, Rabon~~ D8
- ~~15. Smith, Leroy, Elec. Ala. Dry Dock, Box 213-A-8, Fairhope, Mobile~~
- ~~16. Smith, Sam K., Jr., C.P.A. Stockton~~
- ~~17. Stacey, Linda L., Secretary Bald Co. Bk. Stockton Hwy, Bay Minette, Bay Minette~~ D1
- ~~18. Fagua, Herbert W., Retired, 404 Oak St. Fairhope~~
- ~~19. Phillips, Hazel L., Vanity Fair, Star Rt. Stockton, Atmore~~
- ~~20. Presley, William Neal, Contractor, 910 Hoyle Ave. Bay Minette, Bay Minette~~ D5
- ~~21. Nix, James P., Nix Florest & Garden Center, 415 Myrtle Ave. Fairhope, Fairhope~~
- ~~22. Anderson, Clarence, USN, P. O. Box Silverhill, Pensacola~~
- ~~23. Page, Harlan A., Harlan Page Farn. 709 Nixon Av. Bay Minette~~
- ~~24. Middleton, L. A., Independent Ins. 511 Hand Ave. Bay Minette~~ P10
- ~~25. Shepherd, L. E., Jr., Printer, P. O. Drawer Foley~~
- ~~26. Woodson, G. W., Retired, 500 Hand Av. Bay Minette~~
- ~~27. Hall, Mable A., Hall Mart (Operator), P. O. Box 811, Foley, Foley~~ D7
- ~~28. Gwin, Irma W., Clk, Bedsole's 555 Jan Dr. Fairhope~~ D11
- ~~29. Wilcox, Ray, Civil Service, Rt. 1 Robertsedale~~
- ~~30. Till, David L., Insp. Continental Mtrs., 210 Fairhope, Mobile~~
- ~~31. Toler, Johnnie G., Riveria Utilities, 510 S. Uniper St. Foley~~
- ~~32. Touchstone, Ottis, Tenneco, 1705 Collier Av. Bay Minette, Bay Minette~~
- ~~33. Keeton, Mildred L., Smstrs. Bay Slacks, 10 Pensacola Hwy. Bay Minette~~
- ~~34. Corte, Mrs. E. D., Housewife, 54 S. Church St. Box 25, Fairhope~~ P5
- ~~35. Swoboda, Jim, Jr., Contractor, Rt. 1 Box 166, Silverhill~~ P4
- ~~36. Brammon, Ned., Int. Paper Co., 1100 Hwy 31 So. Bay Minette~~ P7
- ~~37. Cox, Ralph S., Retired, 507 N. Ingleside Dr. Fairhope~~ P8
- ~~38. Cox, Rene B., Housewife, 507 N. Ingleside Dr. Fairhope~~ D9
- ~~39. Jones, Harold P., Merchant (Jones Feed Store) Pine Grove Rd. Bay Minette~~
- ~~40. Foster, Walter H., Ford Dealer, 110 Hand Av. Bay Minette~~ D2
- ~~41. Kelly, W. Marvin, Pres. 1st National Bank, P. O. Box 850, Bay Minette~~
- ~~42. Kral, William Sr., Farmer, Robertsedale, Ala. Rt. 1 Box 19, Pensacola, Fla.~~
- ~~43. Mancini, Frank J., Mech, Eng. Palmer & Baker Eng. 101 N. Engleside Dr. Fairhope, Mobile~~
- ~~44. Martin, A. C., Civil Service, Rt. 1 Box 1136, Robertsedale, Pensacola~~
- ~~45. Oliver, Mrs. E. C., Restruant Mgr. P. O. Box 344, Fairhope~~
- ~~46. Owens, Thomas O., Eng. Aide St. Hwy Dept. 1504 Moog Av. Bay Minette~~ P6
- ~~47. Becker, Earl V., Mailman, 509 Hall Av. Bay Minette~~
- ~~48. Becker, Ina H., Chf. Clk. Tax Assessor, 509 Hall Av. Bay Minette~~ P2
- ~~49. Crabb, Carlton, Custom Farm Service, Rt. 1 Robertsedale~~
- ~~50. Boesch, Arthur, Farmer, Rt. 2 Box 308 Bay Minette~~
- ~~51. Bettis, Carrie, Housewife, 412 B. Anderson Blvd. Bay Minette~~
- ~~52. Bill, William D., Jr. C.P.A. P. O. Box 162 Robertsedale,~~

P XXXXX XXXXX A

D-XXXXX XXXXX XX -

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323 41
12

CHARLES SANKS, individ-
ually and d/b/a SANKS
CONSTRUCTION COMPANY,

Plaintiff,

VS.

WILLIAM E. FURLOW and
MARY G. FURLOW,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

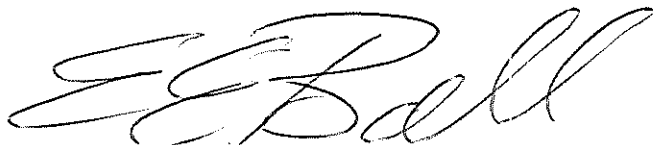
CASE NO. 10,584

AMENDED COMPLAINT

Comes now the Plaintiff in the above styled cause by and through his Attorney of Record and amends the Complaint heretofore filed by him in this cause by adding the following:

COUNT TWO

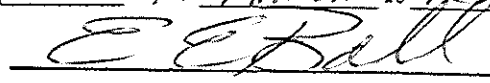
The Plaintiff claims of the Defendants Three Thousand One Hundred Eighty-eight and 67/100 (\$3,188.67) Dollars, due from them for work and labor done for the Defendants by the Plaintiff on to-wit: August 22, 1972, which sum of money with interest thereon is still unpaid.



E. E. BALL,
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the above and foregoing pleading upon counsel for the opposing party by mailing a copy thereof to him, postage prepaid and properly addressed to his office in BAY MINETTE, Alabama.

This 27 day of MARCH 19 73


FILED

MAR 27 1973

EUNICE B. BLACKMON CIRCUIT
CLERK

STATE OF ALABAMA

BALDWIN COUNTY

Charles Sanks, individually and d/b/a Sanks Construction Company files this statement in writing, verified by the oath of Charles Sanks, who has personal knowledge of the facts herein set forth:

That said Charles Sanks, individually and d/b/a Sanks Construction Company claims a lien upon the following property, situated in Baldwin County, Alabama, to-wit:

Lots 2, 3 and 4, Block 2, Jackson Oaks, Sub-division as shown by a plat thereof recorded in Map Book 1, pp. 178-9, Probate Court Records, Baldwin County, Alabama.

This lien is claimed, separately and severally, as to both the buildings and improvements thereon, and the said land.

That said lien is claimed to secure an indebtedness of Three Thousand One Hundred Eighty-eight and 67/100 (\$3,188.67) Dollars with interest, from to-wit: 1st day of August, 1972, for work, labor and material furnished in the renovation and repair of a dwelling house situated on the above described property.

The names of the owners or proprietors of the said property are William E. Furlow and Mary G. Furlow.

STATE OF ALABAMA,
BALDWIN COUNTY

I certify that this instrument was filed on

AUG 22 1972

Claimant

STATE OF ALABAMA

BALDWIN COUNTY

and that no tax was collected. Recorded in

Book

Page

By

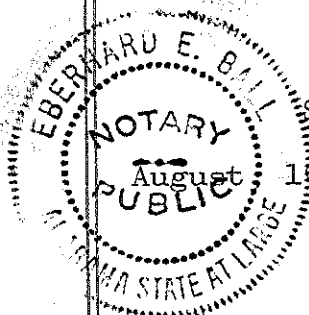
Judge of Probate

Before me, Eberhard E. Ball, a Notary Public in and for the County of Baldwin, State of Alabama, personally appeared Charles Sanks, who being duly sworn, doth depose and say: That he has personal knowledge of the facts set forth in the foregoing statement of lien, and that the same are true and correct to the best of his knowledge and belief.

Affiant

Subscribed and sworn to before me on this the 22 day of August 1972, by said affiant.

Notary Public, Baldwin County, Alabama



CHARLES SANKS, individ-
ually and d/b/a SANKS
CONSTRUCTION COMPANY,

Plaintiff,

VS.

WILLIAM E. FURLOW and
MARY G. FURLOW,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,584

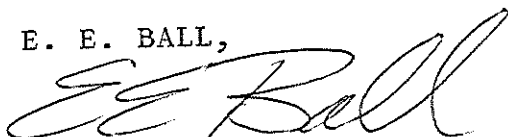
COMPLAINT

The Plaintiff claims of the Defendants the sum of Three Thousand One Hundred Eighty-eight and 67/100 (\$3,188.67) Dollars, together with interest thereon, for material, work and labor done for the Defendants by the Plaintiff, at their request on a building or improvement on the following described property, situated, lying and being in Baldwin County, Alabama, to-wit:

Lots 2, 3, and 4, Block 2, Jackson Oaks, Sub-
division as shown by a plat thereof recorded
in Map Book 1, pp. 178-9, Probate Court Re-
cords, Baldwin County, Alabama

which said amount is due and unpaid. The Plaintiff further avers that said property is the property of the Defendants, William E. Furlow and Mary G. Furlow; that said work and labor was done on said building, or improvement at the request of said Defendants, and at that time the said William E. Furlow and Mary G. Furlow were the owners of said land; that within six months after said indebtedness had accrued, and on, to-wit: August 22, 1972, the Plaintiff filed in the office of the Probate Judge of Baldwin County, the county wherein such property is situated, a verified statement of his claim, or lien, as required by law, a copy of which is hereto attached, marked Exhibit "A" and made a part hereof, as if herein set forth in detail; the Plaintiff claims a lien for said amount upon said lands above described and the building and improvements situated thereon.

E. E. BALL,



Attorney for Plaintiff

FILED

Defendants may be served at:

Rt. 2 Box 570
Daphne, Alabama

AUG 30 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

70-547

Net the Jury find for the Plaintiff in the
Amount of ^{\$}2537.41 plus interest at 8%
from August 1, 1972

L. L. Smith
Lawyer

FILED

AUG 10 1972

CLERK OF DISTRICT COURT

W

SUMMONS AND COMPLAINT

THE 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 SummonWilliam E. Furlow and Mary G. Furlow.....

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.....

William E. Furlow and Mary G. Furlow....., Defendant.....

by

Charles Sanks, individually and d/b/a....., Plaintiff.....
Sanks Construction Company

Witness my hand this.....30.....day of.....August.....1972.....

Ernie B. Blackman..... Clerk

249-2-72

70-548

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Charles Sinks, Inc.

+ d/b/a Sinks Construction
Company

Plaintiffs

vs.

William E. Furlow
Mary H. Furlow

Defendants

SUMMONS AND COMPLAINT

JACKSON OAK RT. 2 BOX 570

Filed Aug 30 1972

FILED

Clerk

AUG 30 1972

EUNICE B. BLACKMON
CIRCUIT CLERK

E. E. Ball

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received in Office

AUG 31 1972

19.....

TAYLOR WILKINS

Sheriff

I have executed this summons

this 2 Sept. 1972

by leaving a copy with

William E. Furlow
Mary H. Furlow

54454

108

Shorts claim 108 miles

Ten Cents per mile Total \$ 10.80

TAYLOR WILKINS Sheriff

W. Crook

DEPUTY SHERIFF

Taylor Wilkins
W. Crook

Sheriff

Deputy Sheriff

CHARLES SANKS, individually
and d/b/a SANKS CONSTRUCTION
COMPANY,

Plaintiff,

vs.

WILLIAM E. FURLOW and MARY
G. FURLOW,

Defendants.

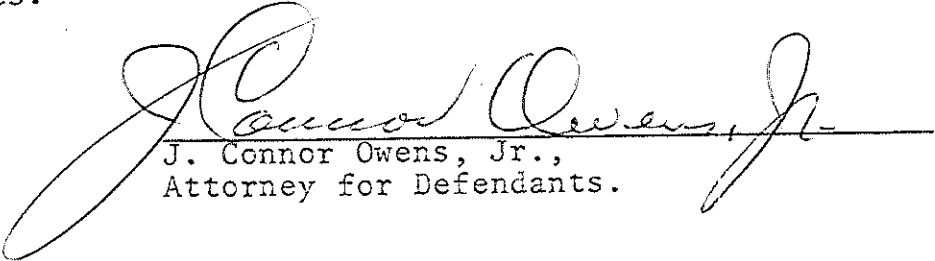
) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW. NO. 10,584.

MOTION TO PRODUCE:

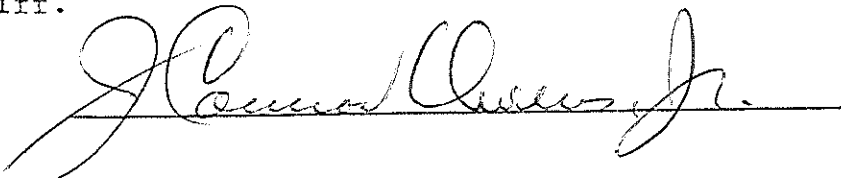
Come now the Defendants in the above styled cause and move the Court to compel the Plaintiff to produce and deliver to the Defendants' attorney, J. Connor Owens, Jr., for inspection and use on the trial of this case on July 10, 1973, all original cancelled checks, vouchers, invoices for materials purchased and all pay-roll records, including time sheets and cancelled checks for labor supplied and used in and about the construction done for the Defendants.

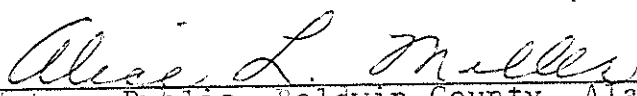

J. Connor Owens, Jr.,
Attorney for Defendants.

STATE OF ALABAMA

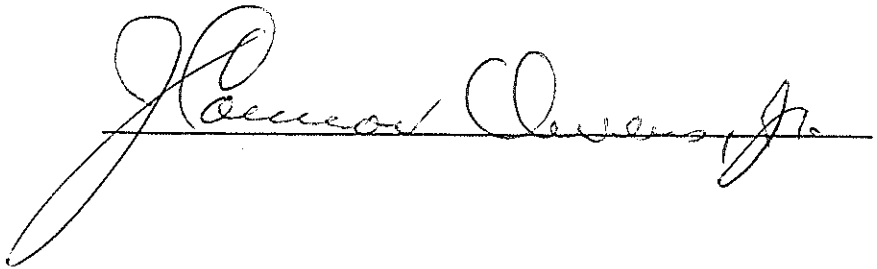
BALDWIN COUNTY

Before me, the undersigned authority within and for said State and County, personally appeared J. Connor Owens, Jr., who, being duly sworn, deposes and says that he is the attorney for the Defendants in this cause; that the documents described in the foregoing motion to produce, constitute evidence pertinent to the issues in this case and are necessary and material to properly dispose of this case and the same are in the possession, custody and control of Plaintiff.


Sworn to and subscribed before
me this 9th day of July, 1973.


Notary Public, Baldwin County, Ala.

I, the undersigned attorney of record for the defendants in the foregoing cause, do hereby certify that I have served a copy of the foregoing motion on E. E. Ball, the attorney of record for the plaintiff in said cause, by personal delivery, this 9th day of July, 1973.

A handwritten signature in cursive script, reading "J. Russell Owens, Jr.", written over a horizontal line.

FILED

JUL 10 1973

EUNICE B. BLACKMON CIRCUIT
CLERK

CHARLES SANKS, individ-
ually and d/b/a SANKS
CONSTRUCTION COMPANY,

Plaintiff,

VS.

WILLIAM E. FURLOW and
MARY G. FURLOW,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,584

AMENDED COMPLAINT

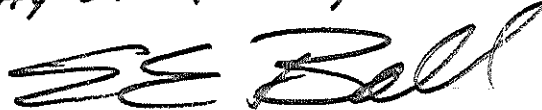
Comes now the Plaintiff in the above styled cause by and through his Attorney of Record and again amends the Complaint heretofore filed by him by deleting from lines one and two of both Counts the words and figures "Three Thousand One Hundred Eighty-eight and 67/100 (\$3,188.67) Dollars" and substituting therefore in said lines of both Counts the following:

"Three Thousand Three Hundred Seventy-one and 41/100 (\$3,371.41) Dollars."



E. E. BALL
Attorney for Plaintiff

I HEREBY CERTIFY THAT I HAVE SERVED THE
ABOVE & FOREGOING PLEADING UPON THE HONORABLE
J. CONNOR OWENS BY HANDING HIM A COPY THEREOF
ON THIS THE 9TH DAY OF APRIL, 1973



FILED

APR 9 1973

EUNICE B. BLACKMON
CIRCUIT
CLERK

70-638

CHARLES SANKS, individually,
and d/b/a SANKS CONSTRUCTION
COMPANY,

Plaintiff,

vs.

WILLIAM E. FURLOW and MARY
G. FURLOW,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

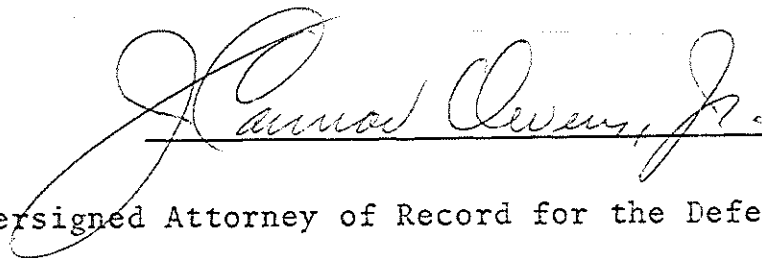
AT LAW. NO. 10,584

MOTION:

Now come the Defendants in the above styled cause and moves the Plaintiff to more fully answer the Interrogatories filed in this cause by the Defendants, and shows unto this Court as follows:

1. That Defendants in this cause have been furnished with invoices and time sheets total approximately \$9,749.85.
2. That Plaintiff admits that not all copies have been furnished and refuses to furnish further copies.
3. That Plaintiff's failure to furnish copies so that the same might be compared with items placed in and on the premises of the Defendants prevents the Defendants from properly preparing their case.
4. That Plaintiff has allegedly furnished items requested in Interrogatory numbered 10, but has not attached supporting documents requested by Interrogatory numbered 11, to-wit, being vouchers issued in payment of time for work and labor allegedly incurred.

WHEREFORE, Defendants move this Honorable Court to require the Plaintiff to fully answer the Interrogatories heretofore propounded.



I, the undersigned Attorney of Record for the Defendants in the foregoing cause, do hereby certify that I have caused a copy of the foregoing motion to be served on E. E. Ball, the Attorney of Record for the Plaintiff in said cause, by placing the same in the United States Mail, properly addressed, with postage prepaid, this 9th day of April, 1973.

70-639



iled
4-11-73
B.B. Blackmon
circled

CHARLES SANKS, individ-
ually and d/b/a SANKS
CONSTRUCTION COMPANY,

Plaintiff,

VS.

WILLIAM E. FURLOW and
MARY G. FURLOW,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,584

AMENDED COMPLAINT

Comes now the Plaintiff in the above styled cause by and through his Attorney of Record and amends the Complaint heretofore filed by him in this cause by adding the following:

COUNT THREE

Defendants owe Plaintiff Three Thousand Three Hundred Seventy-one and 41/100 (\$3,371.41) Dollars due by open account.

Wherefore, Plaintiff demands judgment against Defendants in the sum of Three Thousand Three Hundred Seventy-one and 41/100 (\$3,371.41) Dollars, interests and costs.



E. E. BALL
Attorney for Plaintiff

Filed 7-10-73

Ernest B. Blackman
Circuit Clerk