

FAIRHOPE HARDWARE & SUPPLY  
COMPANY, INC.,

a Corporation,  
Plaintiff

-vs-

WILMER TAYLOR,

Defendant

2241

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

COMPLAINT

The Plaintiff claims of the Defendant the sum of Four Hundred Eighty-six and 40/100 Dollars (\$486.40) for work and labor and materials furnished by Plaintiff at the request of WILMER TAYLOR, on improvements on the following described property, viz:

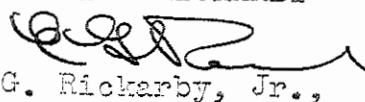
Beginning at the Half Section Point on Southern boundary line of Section 29, Township 5 South, Range 2 East, run west 831 feet; north 870.5 feet for point of beginning; north 208.5 feet; east 625 feet; south 208.5 feet; west 625 feet to beginning. Containing three acres.

which said indebtedness accrued on to-wit, the 24th day of October, 1953, and is now due and unpaid.

The Plaintiff alleges that the above described property is the property of the Defendant; that said materials were furnished for improving said land under and by virtue of a contract with the Defendant, the owner or proprietor thereof; that within six months after the said indebtedness had matured, on, to-wit, the 24th day of April, 1954, the Plaintiff did file in the office of the Judge of Probate of the County wherein said land is situated a verified statement as required by law, a copy of which is attached hereto, made a part hereof, and marked "Exhibit A".;

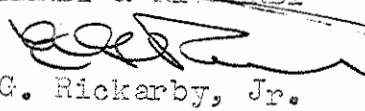
WHEREFORE Plaintiff claims a lien for said amount upon said land and buildings and improvements situated thereon.

RICKARBY & RICKARBY

By:   
E. G. Rickarby, Jr.,  
Attorney for Plaintiff

The account sued on is evidenced by and itemized and verified statement of account filed herewith.

RICKARBY & RICKARBY

By:   
E. G. Rickarby, Jr.  
Attorney for Plaintiff

" EXHIBIT A"

STATE OF ALABAMA:

COUNTY OF BALDWIN:

FAIRHOPE HARDWARE & SUPPLY COMPANY, INC., a Corporation, files this statement in writing verified by the oath of WILLIAM R. RUFFLES, JR., who has personal knowledge of the facts herein set forth:

That said Fairhope Hardware & Supply Company, Inc. claims a lien upon the following property situated in Baldwin County, Alabama, to-wit:

Beginning at the Half Section Point on Southern boundary line of Section 29, Township 5 South, Range 2 East, run west 831 feet; north 870.5 feet for point of beginning; north 208.5 feet; east 625 feet; south 208.5 feet; west 625 feet to beginning. Containing three acres.

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 Four Hundred Eighty-six and 40/100 Dollars (\$486.40) with interest from to-wit, the 24th day of October, 1953, for material and labor furnished.

The owner or proprietor of said property is WILMER TAYLOR.

FAIRHOPE HARDWARE & SUPPLY  
COMPANY, INC.

By: (Signed)

WILLIAM R. RUFFLES, JR.

William R. Ruffles, Jr.,  
President.

Before me, E. G. Rickarby, Jr., a Notary Public in and for the County of Baldwin, State of Alabama, personally appeared William R. Ruffles, Jr., 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.

(signed) WILLIAM R. RUFFLES, JR.  
William R. Ruffles, Jr.

Subscribed and sworn to before me this the 23 day of April, 1954.

(Signed) E. G. RICKARBY, JR.  
Notary Public, Baldwin County, Alabama.

RICKARBY & RICKARBY  
BY:

(Signed) E. G. RICKARBY, JR.  
E. G. Rickarby, Jr.,  
Attorney for Plaintiff.

SUMMONS AND COMPLAINT

Moore Printing Co.

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 Summon Wilmer Taylor

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 \_\_\_\_\_

Wilmer Taylor

\_\_\_\_\_, Defendant

by Fairhope Hardware & Supply Company, Inc.

\_\_\_\_\_, Plaintiff

Witness my hand this

24<sup>th</sup>

day of

April

19 54

Alice J. [Signature], Clerk

No. 2241

Page \_\_\_\_\_

## THE STATE OF ALABAMA

BALDWIN COUNTY

## CIRCUIT COURT

Fairhope Hardware &amp; Supply

Co., Inc.

Plaintiffs

vs.

Wilmer Taylor

Defendants

## SUMMONS and COMPLAINT

Filed

4-2419 54

Clerk

Rickerby &amp; Rickerby

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Montrose, Ala.

RECEIVED IN OFFICE

, 19\_\_\_\_\_

, Sheriff

I have executed this summons

this

May 2, 1954

by leaving a copy with

Leaving a Copy  
C. S. for  
Wilmer Taylor

Taylor Wilmer

Sheriff

St. James  
Deputy Sheriff

FAIRHOPE HARDWARE & SUPPLY  
COMPANY, INC.,

A Corporation,  
Plaintiff

-VS-

WILMER TAYLOR,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

On this the 9<sup>th</sup> day of June, 1954, the Defendant filed motion for a judgment by default and it appearing from the record that service was had on the Defendant on 2 May, 1954, and he has not appeared, and the account was evidenced by an itemized and verified statement showing the amount of the indebtedness, the court does find that the Plaintiff is entitled to the sum of Five Hundred Three and 42/100 Dollars (\$503.42) and to a lien upon the property described in the Complaint for said amount it is therefore ORDERED, ADJUDGED and DECREED that the Plaintiff do have and recover of the Defendant the sum of Five Hundred Three and 42/100 Dollars (\$503.42) together with the costs of this cause and that a lien upon said property described in the Complaint, viz:

Beginning at the Half Section Point on Southern boundary line of Section 29, Township 5 South, Range 2 East, run west 831 feet; north 870.5 feet for point of beginning; north 208.5 feet; east 625 feet; south 208.5 feet; west 625 feet to beginning. Containing three acres.

be and the same is hereby established and declared in favor of the Plaintiff for said amount and that said property is hereby condemned and ordered sold for the satisfaction of this judgment as provided by law.

Hubert M. Hall  
Judge, 31st Judicial Circuit.

LAW OFFICES

RICKARBY & RICKARBY

ELLIOTT G. RICKARBY  
(DECEASED)

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

6 June 1954

Mrs. Alice J. Duck  
Clerk Circuit Court  
Bay Minette, Ala.

Dear Mrs. Duck:

Re: Fairhope Hdwe & Supply  
Vs: Wilmer Taylor  
No: 2241

With this we are handing you papers in Fairhope Hardware  
& Supply vs. Wilmer Taylor—motion for judgment by de-  
fault and decree.

Please get them serviced.

Yours very truly,



E. G. Rickarby, Jr.

R/i  
cc: Fairhope Hdwe.  
1942  
Encls.

FAIRHOPE HARDWARE & SUPPLY  
COMPANY, INC.,

a Corporation,  
Plaintiff

-vs-

WILMER TAYLOR,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

Comes the Plaintiff and shows to the court that service was had on the Defendant on the 2nd day of May, 1954, and that thirty days has elapsed and that Defendant has failed to plead, answer or demur.

WHEREFORE the Plaintiff moves for a judgment by default on the itemized and verified statement filed with said summons and complaint for the sum of Five Hundred Three and 42/100(\$503.42) which includes principal of Four Hundred Eighty-six & 40/100 Dollars (\$486.40) and interest on said sum for seven months in the sum of Seventeen & 02/100 Dollars (\$17.02) making a total of Five Hundred Three and 42/100 Dollars (\$503.42).

RICKARBY & RICKARBY

By: 

E. G. Rickarby, Jr.,  
Attorney for Plaintiff

ELLIOTT G. RICKARBY  
(DECEASED)

LAW OFFICES  
**RICKARBY & RICKARBY**

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

23 April 1954

Mrs. Alice J. Duck  
Clerk Circuit Court  
Bay Minette, Ala.

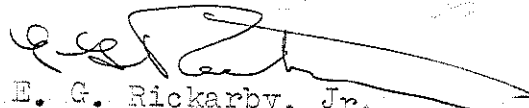
Dear Mrs. Duck:

With this we are handing you summons and complaint,  
itemized and verified statement of account and veri-  
fied statement of lien in the above matter.

Please process.

Re: Fairhope Hdwe & Supply  
Vs: Wilmer Taylor

Yours very truly,

  
E. G. Rickarby, Jr.

R/i  
1942  
Encl.



NO 2241

Fairhope Hdw. & Supply Co.

VS

Wilma Taylor

Latit Material

4-24-5-4P

STATE OF ALABAMA:

COUNTY OF BALDWIN:

Before me, the undersigned Notary Public,  
personally appeared Wm. R. Ruffles Jr.

who being first duly sworn, deposes and says that he is

President

for FAIRHOPE HARDWARE & SUPPLY

COMPANY and that the attached itemized account is a true  
and correct statement of account between FAIRHOPE HARDWARE  
& SUPPLY COMPANY and WILMER TAYLOR.

Wm. R. Ruffles Jr.  
Affiant

Subscribed and sworn to before me this the

17 day of April, 1954.

James S. Higginson  
Notary Public, Baldwin County, Alabama.

