

GRAYDON NEWMAN
ATTORNEY-AT-LAW
GULF SHORES, ALABAMA

November 4, 1954.

2432

Mrs. Alice J. Duck, Circuit Clerk
Baldwin County
Bay Minette, Ala.

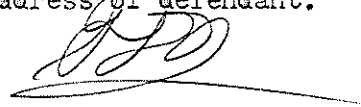
Dear Mrs. Duck:

Enclosed is an original and one copy of a
complaint, that I wish to file in Court There; I will
appreciate your taking care of its execution for me.

Yours truly,


Graydon Newman

P.S. See back of complaint for address of defendant.



SUMMONS AND COMPLAINT

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 2132

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ALFA I. LOMAX

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

ALFA I. LOMAX, Defendant

by R. V. PEAVY, et als, Plaintiff

Witness my hand this 4th day of November 1954

Alvin J. [Signature], Clerk

R. V. Peavy, Qutman Cooper and
 Van Cooper, doing business as
 Gulf Shores Building Supply Co.,
 Plaintiff's
 VS
 Alfa L. Lomax
 Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY,
 TWENTY-EIGHTH JUDICIAL CIRCUIT OF
 ALABAMA.

CASE NO. _____

COUNT ONE

The plaintiffs claim of the defendant \$207.93 due by account on, to-wit: May 19th, 1954, which sum of money with interest thereon, is still unpaid.

COUNT TWO

The plaintiffs claim of the defendant \$207.93 for merchandise, goods and chattles sold by the plaintiff to the defendant on to-wit: May 19th, 1954, which sum of money with interest thereon, is still unpaid.

COUNT THREE

The plaintiffs claim of the defendant \$207.93 for building material sold by plaintiffs to the defendant during the month of may 1954 and prior thereto, to be used and which were used in the erection of or making repairs to a building upon the real property described to-wit:

Lot 32 Block 1, Southport Unit of Gulf Shores, Alabama, Also commence at the southwest corner of Lot 32 mentioned above; thence run westerly in line with extension of north line of 1st., avenue west in said subdivision 100 feet for point of beginning; thence westerly in line with said extension 200 feet; thence northerly on a line parallel with west line above mentioned Lot 32, to the Intercoastal Canal; thence easterly along said canal 200 feet; thence southeasterly on a line parallel with and 100 feet west of west line of above Lot 32 to the point of beginning.

together with interest thereon from to-wit: May 19th, 1954, and plaintiffs aver that they are entitled to a lien upon said real estate hereinabove described for the said amount, and that on to-wit: October 15th, 1954, they filed in the Office of the Judge of Probate of Baldwin County, Alabama, in which County said property is situated, a statement in writing certified by Van Cooper, who had knowledge of the facts therein stated, containing a just and true account of the debt secured by said lien after all the just credits had been given, a description of the property on which the lien is claimed, and the name of the owner thereof. Wherefore, plaintiff prays that said lien may be established upon said property and that the same may be condemned to be sold for the purpose of satisfying said demand and line, together with interest thereon.

Haydon Newman
 Attorney for Plaintiffs