

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

2598

TO ANY SHERIFF OF THE STATE OF ALABAMA — GREETING:

You are hereby commanded to summon T. A. McKENZIE and McKENZIE to appear and answer, plead, or demur, within thirty (30) days from the service of this writ, to a Bill of Complaint filed against them in Circuit Court, at Law, for said County of said State by COASTAL CONCRETE COMPANY, A CORPORATION.

Herein fail not. Due return make of this writ as the law directs.

Witness this 26th day of April, 1955.

W. J. Lusk
Clerk of Court

Defendants live near
Barnwell, Alabama

COASTAL CONCRETE COMPANY,
a Corporation
Plaintiff

VS.

T. A. McKENZIE and
Margaret McKenzie
Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE

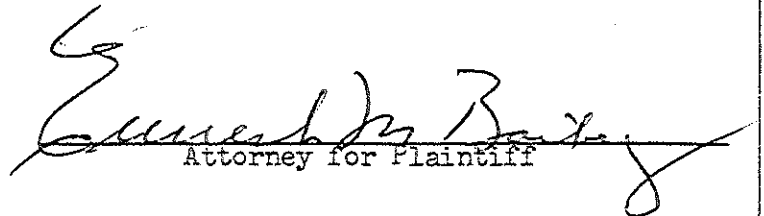
The Plaintiff claims of the Defendant Two Hundred Thirty One Dollars and Five Cents (\$231.05), due from them for work and labor done for the Defendants by the Plaintiff on the 26th day of October, 1954, at their request, which sum of money with the interest thereon, is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendants Two Hundred Thirty One Dollars and Five Cents (\$231.05), due from them by account on, to-wit, the 26th day of October, 1954, which sum of money with the interest thereon, is still unpaid. Plaintiff avers that said amount represents building materials furnished by the COASTAL CONCRETE COMPANY, a Corporation, at the request of the Defendants, which was furnished for and which was used in the construction or improvement or repair of certain real estate of the Defendants described as:

The East 14 Acres of the SE $\frac{1}{4}$ of the SW $\frac{1}{4}$
of Section 11, Township 7 South, Range 2
East in Baldwin County, Alabama

And Plaintiff claims a lien on said real estate as provided for mechanics and materialmen by law and Plaintiff further avers that on April 26, 1955 the Plaintiff filed in the Office of the Judge of Probate of Baldwin County, Alabama a verified claim of lien, copy of which is attached hereto as Exhibit A and made a part hereof and Plaintiff prays that said lien may be established and that said real estate be condemned for the satisfaction of said indebtedness and that same be ordered sold to satisfy said indebtedness.


Attorney for Plaintiff