

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2763

Oct.

TERM, 1955

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon GILBERT B. SAYLE and MARY JUDITH SAYLE

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

GILBERT B. SAYLE and MARY JUDITH SAYLE

, Defendant

by WILSON PUMP COMPANY, INC. A Corporation

, Plaintiff

Witness my hand this 31 day of Oct. 1955.

Defendants may be served at:
Lillian, Alabama

Alice J. Smith, Clerk

INC.,
WILSON PUMP COMPANY, A
Corporation,

Plaintiff,

VS.

GILBERT B. SAYLE AND
MARY JUDITH SAYLE,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. _____

The plaintiff claims of the defendants Six Hundred and no/100ths (\$600.00) Dollars due by an account on, to-wit, the 1st day of June, 1954, together with the interest thereon, which is due and unpaid. Plaintiff avers that said account represents plumbing materials and labor furnished by the plaintiff under contract with the defendants which was furnished for and which was used in the construction or improvement or repair of certain real estate of the defendants in Baldwin County, Alabama, described as follows:

Lots Numbered 7 and 8, in Block 29, in the Town of Lillian, Alabama, (Plat No. 1), a subdivision of the South half ($S\frac{1}{2}$) of the Southeast quarter ($SE\frac{1}{4}$) of Section 23, and the North half ($N\frac{1}{2}$) of the Northeast quarter ($NE\frac{1}{4}$) of Section 27, Township 7 South, Range 6 East, as per a plat thereof recorded in Miscellaneous Book 1, page 294, of the Probate Records of 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 the 31st day of July, 1954, the plaintiff filed in the Probate Office of Baldwin County, Alabama, a claim of lien, a copy of which is attached hereto as "Exhibit A" and, by reference, 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 the same be ordered sold to satisfy said indebtedness.

Julian H. Moschberg, Jr.
ATTORNEY FOR PLAINTIFF.

I HEREBY CERTIFY THAT I HAVE DEPOSITED THE SUM OF \$25.00 WITH THE
THE CLERK OF THIS COURT AS SECURITY FOR THE COSTS IN THIS CAUSE.

Julian A. Madbury, Jr.
ATTORNEY FOR PLAINTIFF.

"EXHIBIT A"

STATE OF ALABAMA,
COUNTY OF BALDWIN.

Wilson Pump Company, Inc., a corporation, files this statement in writing, verified by the oath of Cecil T. Wilson, President, who has personal knowledge of the facts herein set forth:

That the said Wilson Pump Company claims a lien upon the following property, situated in Baldwin County, Alabama, to-wit:

Lots 7 and 8, Block 29, of Lillian (Plat No. 1), a Subdivision of the South half ($S\frac{1}{2}$) of the Southeast quarter ($SE\frac{1}{4}$) of Section 23, and the North half ($N\frac{1}{2}$) of the Northeast quarter ($NE\frac{1}{4}$) of Section 27, Township 7 South, Range 6 East, according to a plat thereof recorded in Miscellaneous Book 1, page 294, of the Probate Records of 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 and indebtedness of Six Hundred Sixty-eight and No/100 (\$668.00) Dollars, with interest from, to-wit: the 11th day of May, 1954, for:

1. Roughed in plumbing for complete 3-piece bath.
2. Furnished and installed septic tank and drain field.
3. Furnished and installed 5-foot tub and electric water heater.
4. Installed commode and wash basin (furnished by owners).
5. Installed water pump and water tank on owner's well; furnished pump and tank.

The name of the owner or proprietor of said property is Mr. and Mrs. Gilbert B. Sayle.

WILSON PUMP COMPANY, INC.

by CECIL T. WILSON President.

STATE OF FLORIDA
COUNTY OF ESCAMBIA

Before me, R. Brownlee Eggart, a Notary Public in and for said County and State, personally appeared Cecil T. Wilson, 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

"EXHIBIT A" (Continued)

the same are true and correct to the best of his knowledge and belief.

Cecil T. Wilson

Subscribed and sworn to before me this 30th day of July, 1954, by said affiant.

R. Brownlee Eggart
Notary Public

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 2763

WILSON PUMP COMPANY, INC.,
A Corporation,
Plaintiff,

VS.

GILBERT B. SAYLE AND
MARY JUDITH SAYLE,
Defendants.

COMPLAINT.

TELFAIR J. MASHBURN, JR.

ATTORNEY-AT-LAW
DAY MINETTE, ALABAMA

Defendants May be served at:

Lillian, Alabama