

LAW OFFICES  
**E. G. RICKARBY**  
BANK BUILDING  
FAIRHOPE, ALABAMA

P. O. BOX 71

May 7th, 1957

Mrs. Alice Duck  
Clerk of Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

In Re: Craft Company  
vs.  
James L. Mosley  
Our File No. 4006

Please put the Summons and Complaint in the Craft Company vs. James L. Mosley matter, up for a judgment by default on the itemized and verified statement of account for \$2350.15 principal and \$58.17 interest and advise and I will prepare the order as to the lien as soon as I am advised that the judgment is rendered and that the amount is correct.

Yours very truly,

*E. G. Rickarby*

EGR/r1  
c/c Mr. C. L. Thompson  
c/c Craft Company

2350.15  
58.17  
2408.32

Exhibit A

STATE OF ALABAMA

BALDWIN COUNTY

CRAFT COMPANY, INC., a corporation, files this statement in writing, verified by the oath of ANN B. CRAFT, who has personal knowledge of the facts herein set forth:

That said CRAFT COMPANY, INC., claims a lien upon the following property, situated in Baldwin County, Alabama, to-wit:

Lot 207 of Fairwood Subdivision No. 3, a subdivision in Fairhope, Baldwin County, Alabama, plat of which is recorded in the Probate Court of Baldwin County, Alabama, with improvements thereon and refrigerator in house.

That said 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 TWO THOUSAND THREE HUNDRED FIFTY DOLLARS AND FIFTEEN CENTS (\$2,350.15) with interest from the 11 day of December, 1956, for labor and materials furnished.

The name of the owner or proprietor of said property is :

JAMES L. MOSELEY and GERALDINE F. MOSELEY.

CRAFT COMPANY, INC.

BY:

Ann B. Craft  
ANN B. CRAFT  
Secretary and Treasurer

Before me, E. G. Rickarby, a notary public in and for the county of Baldwin, State of Alabama, personally appeared ANN B. CRAFT, who being duly sworn, doth depose and say: That she 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 her knowledge and belief.

Ann B. Craft  
Affiant

Sworn to and subscribed before me this the 6 day of February, 1957, by said affiant.

E. G. Rickarby /s/  
Notary Public

E. G. Rickarby  
Attorney for Claimant

Phones:  
Day 8644  
Night 8849

SALES  
&  
SERVICE

# CRAFT COMPANY, INC.

PLUMBING - HEATING - ELECTRICAL - APPLIANCES

P. O. BOX 265  
DAPHNE, ALABAMA

February 1, 1957

## STATEMENT OF ACCOUNT

Mr. James L. Mosley  
33 Jan Drive  
Fairhope, Alabama

<u>DATE</u>	<u>FOL.</u>	<u>DEBITS</u>	<u>CREDITS</u>	<u>BALANCE</u>
June 15, 1956	Balance Forward			163.14
July 6, 1956	6844	700.00		863.14
July 26, 1956	2787		300.00	563.14
Sept 29, 1956	3540		300.00	263.14
Nov. 7, 1956	7609	115.33		378.47
Dec. 11, 1956	7909	1962.36		2340.83
Dec. 11, 1956	7941	9.32		2350.15

CRAFT COMPANY, INC  
DAPHNE, ALABAMA

LAW OFFICES  
E. G. RICKARBY  
BANK BUILDING  
FAIRHOPE, ALABAMA  
February 6, 1957

Mrs. Alice Duck  
Clerk of Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

In Re: Craft Co., Inc.  
vs.  
James L. Mosley  
Our File No. 4006

With this we are handing you Summons and Complaint, together with itemized and verified statement and copy of lien in the above mentioned account.

Please process, charge to my account and oblige.

Yours very truly,



rl  
c/c Craft Co.  
Encl.  
3-6-57

LAW OFFICES  
E. G. RICKARBY  
P. O. BOX 71  
FAIRHOPE, ALABAMA  
TELEPHONE WA 8-9836

February 11, 1957

Attn: Mrs. Glover

Probate Court  
Bay Minette, Alabama

Dear Mrs. Glover:

In Re: Craft Co., Inc.  
vs.  
James L. Mosley  
Our File No. 4006

Enclosed find Lien in the above mentioned matter. Please record,  
charge to my account and oblige.

Yours very truly,

EGR/r1  
c/c Mrs. Duck

CRAFT COMPANY, INC.  
A Corporation,

PLAINTIFF

vs.

JAMES L. MOSLEY,

DEFENDANT

) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA  
) AT LAW  
)  
)  
)


C O M P L A I N T

Count I.

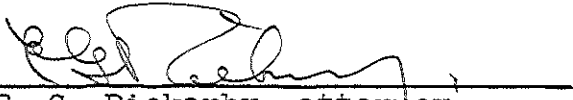
The Plaintiff claims of the Defendant TWO THOUSAND THREE HUNDRED FIFTY DOLLARS AND FIFTEEN CENTS (\$2,350.15) for labor and materials furnished by the plaintiff at the request of the defendant on the building or improvements on the following described property, to-wit:

Lot 207 of Fairwood Subdivision No. 3, a subdivision in Fairhope, Baldwin County, Alabama, plat of which is recorded in the Probate Court of Baldwin County, Alabama, with improvements thereon and refrigerator in house which said indebtedness accrued on, to-wit, the 11 day of December, 1956, and is now due and unpaid.

Plaintiff alleges that the above described property is the property of the defendant, JAMES L. MOSLEY and GERALDINE F. MOSLEY; that said work or labor was done or preformed on said buildings or improvements on said land, under and by virtue of a contract with the said JAMES L. MOSLEY, the owner or proprietor thereof; that within six months, after the said indebtedness had matured on, to-wit, the 11 day of December, 1956, 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.

  
E. G. Rickarby  
Attorney for Plaintiff

NOTE: The account sued on is evidenced by an itemized and verified statement filed herewith.

  
E. G. Rickarby, attorney

SUMMONS AND COMPLAINT

Baldwin Times

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 JAMES L. MOSLEY

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 \_\_\_\_\_

JAMES L. MOSLEY

Defendant .....

by CRAFT COMPANY, INC., a corporation

Plaintiff.....

Witness my hand this 12 day of Feb 1957

Reice French Clerk