

COMPLAINT

Reynolds Brothers Lumber
Company, a co-partnership
composed of J.P. Reynolds
and M.S. Reynolds

Plaintiff

VS.

C.J. Johnson individually
and d/b/a Johnson Laundry
& Cleaners

Defendant

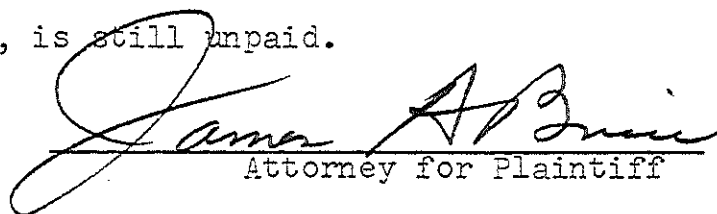
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE:

The plaintiff claims of the defendant ONE HUNDRED SEVENTY-SEVEN & 67/100 (\$177.67) DOLLARS, due from him on account, to wit: the 22nd day of May, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT TWO:

The plaintiff claims of the defendant ONE HUNDRED SEVENTY-SEVEN & 67/100 (\$177.67) DOLLARS, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant, on, to wit: the 22nd day of May, 1954, which sum of money, with interest thereon, is still unpaid.


Attorney for Plaintiff

There is attached to the original hereof, an itemized statement of account verified by affidavit of J.P. Reynolds, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 22nd day of May, 1954, and due at present.

Mr. C.J. Johnson has
a place of business
in Fairhope, Alabama.

STATE OF ALABAMA)
BALDWIN COUNTY)

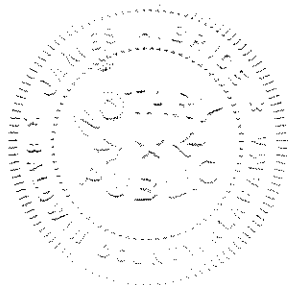
Before me, James A. Brice, a Notary Public in and for said County in said State, personally appeared J. P. REYNOLDS, who, being by me first duly sworn, deposes and says; that he is a partner for the firm of Reynolds Brothers Lumber Co.; that the annexed statement of the account of said Reynolds Brothers Lumber Co. against C.J. Johnson of Fairhope, Alabama is just, true and correct; that there is now due on said account the sum of \$177.65 after deducting all credits, set-offs or counterclaims.

REYNOLDS BROS. LUMBER COMPANY

By J. P. Reynolds

Sworn to and subscribed before me this 20th day of February, 1957. Witness my hand and official seal.

James A. Brice
Notary Public



SUMMONS AND COMPLAINT

Moore Ptg. 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 C.J. Johnson individually and

d/b/a Johnson Laundry & Cleaners

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 C.J. Johnson in-
dividually and d/b/a Johnson Laundry & Cleaners-----, Defendant--

by Reynolds Brothers Lumber Company, a co-partnership composed-----
of J.P. Reynolds and M.S. Reynolds-----, Plaintiff--

Witness my hand this-----day of-----19-----

-----, Clerk

REYNOLDS BROTHERS LUMBER COMPANY,
a co-partnership composed of
J.P. REYNOLDS, and M.S. REYNOLDS

IN THE CIRCUIT COURT OF

PLAINTIFF

BALDWIN COUNTY, ALABAMA

VS

C.J. JOHNSON, individually and
D/B/A JOHNSON LAUNDRY & DRY
CLEANERS,

AT LAW, NO. 3153

DEFENDANT

NOTICE TO DEFENDANT

Take notice that upon the written request of JAMES A. BRICE, and RICHARD C. LACEY, Attorneys for Plaintiff, a judgment creditor, filed in this Court in this cause, you are commanded to file in this Court within thirty days from the service of this notice, a statement in writing, under oath, of all of your assets and all the assets of Johnson Laundry and Dry Cleaners including money, choses in action, notes, bonds, and accounts, and all other property, real, personal or mixed or any interest therein, with a detailed description of same, the location and reasonable value of each item thereof, together with a detailed list or statement of any and all liens, mortgages or incumbrances thereon showing the amounts due upon each, and the owner or holder of such liens, incumbrances or mortgages.

Be governed accordingly.

Dated this 12 day of June, 1959.


Clerk, of the Circuit Court.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

VS

DEFENDANT

Whereas, in the above entitled cause Reynolds Brothers Lumber Company did recover a Judgement against C. J. Johnson individually and D/B/A Johnson Laundry and Cleaners at the May term, 1957, of the Circuit Court, Baldwin County, Alabama, for the sum of One Hundred Ninety Eight Dollars and Ninety One Cents (\$198.91), besides the cost of said cause.

This is to request you as Clerk of the said Circuit Court of Baldwin County, Alabama, to issue a notice to the said C. J. Johnson requiring him to file in this Honorable Court, within thirty days from the service of such notice, a statement in writing, under oath of all the assets of the said C. J. Johnson, including money, choses in action, notes, bonds, and accounts, and all other property, real, personal, or mixed, or any interest therein, with a detailed description of the same, the location, and reasonable value of each item thereof, together with a detailed statement of any and all liens, mortgages, or incumbrances thereon, showing the amounts due upon each, and the owner or holder of such liens, incumbrances or mortgages.

James A. Brin
Richard C. Laegre

Attorneys for Plaintiff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

VS.

C. J. JOHNSON, individually
and D/B/A JOHNSON LAUNDRY
& DRY CLEANERS

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Whereas execution was thereafter issued on said Judgement against said C. J. Johnson and on May 28, 1959, the said execution was returned with the endorsement thereon "NO PROPERTY FUND"; and said Judgement remains unpaid and unsatisfied; now therefore,

This is to request you as Clerk of the said Circuit Court of Baldwin County, Alabama, to issue a notice to the said C. J. Johnson requiring him to file in this Honorable Court, within thirty days from the service of such notice, a statement in writing, under oath of all the assets of the said C. J. Johnson, including money, choses in action, notes, bonds, and accounts, and all other property, real, personal, or mixed, or any interest therein, with a detailed description of the same, the location, and reasonable value of each item thereof, together with a detailed statement of any and all liens, mortgages, or incumbrances thereon, showing the amounts due upon each, and the owner or holder of such liens, incumbrances or mortgages.

The 9th day of June, 1959.

Richard K. Lacey

Attorneys for Plaintiff

REYNOLDS BROTHERS LUMBER
COMPANY, a co-partnership
composed of J. P. REYNOLDS
and M. S. REYNOLDS

PLAINTIFF

VS

C. J. JOHNSON, individually
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& DRY CLEANERS

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IN THE CIRCUIT COURT OF
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AT LAW

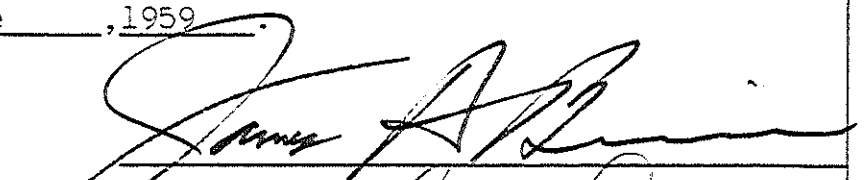
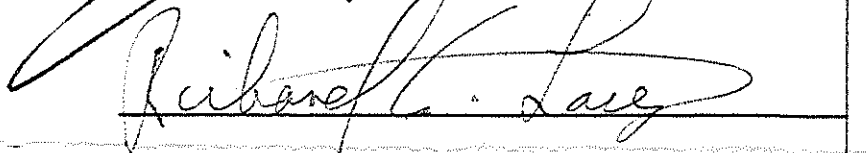
TO THE CLERK OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

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The 9th day of June, 1959.

Attorneys for Plaintiff

FILED

JUN 11 1959

ALICE J. DUCK, CLERK
REGISTER

REYNOLDS BROTHERS LUMBER
COMPANY, a co-partnership
composed of J. P. REYNOLDS
and M. S. REYNOLDS

PLAINTIFF

VS.

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& DRY CLEANERS

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

728.3153

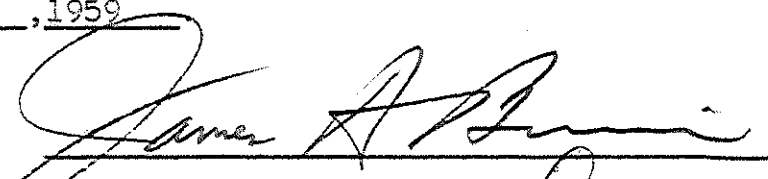
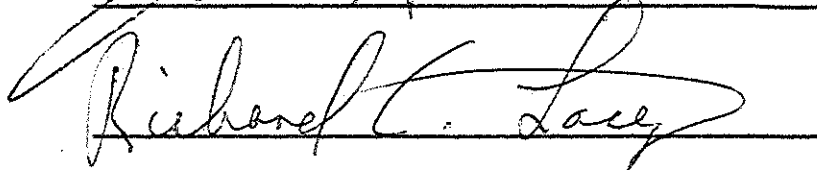
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The 9th day of June, 1959

Attorneys for Plaintiff

FILED

JUN 11-59

ALICE L. DUCK, CLERK
REGISTER

REYNOLDS BROTHERS LUMBER COMPANY,
a co-partnership composed of
J.P. REYNOLDS, and M.S. REYNOLDS

IN THE CIRCUIT COURT OF

PLAINTIFF

BALDWIN COUNTY, ALABAMA

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AT LAW, NO. 3153

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Be governed accordingly.

Dated this 12 day of June, 1959.

Clerk, of the Circuit Court.

REYNOLDS BROTHERS LUMBER COMPANY,
a co-partnership composed of
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PLAINTIFF

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Be governed accordingly.

Dated this 12 day of June, 1959.

FAIRHOPE

Gerice L. Drake

Clerk, of the Circuit Court.