

CUNNINGHAM AND WILKINS
ATTORNEYS AT LAW
709 MERCHANTS NATIONAL BANK BUILDING
MOBILE 11, ALABAMA

ROBERT T. CUNNINGHAM
ROBERT B. WILKINS
D. RICHARD BOUNDS

April 5th, 1957

TELEPHONE
HEMLOCK 8-2478

Mrs. Alice Duck, Clerk
Circuit Court, Baldwin County
Bay Minette, Alabama

3160

Re: Warren Norville vs.
G. W. White d/b/a
White Electric Co.

Dear Mrs. Duck:

Some time ago I filed a suit styled as above. After sending the complaint to you for filing I noticed a change would have to be made and called you requesting that you return the papers to me.

Some two weeks have passed and I have still not received these papers. At the time I talked to you, you had not received them yet, but you stated that you would be on the lookout for them and return them to this office. Please let me know whether you ever received these papers. If you have received them I would appreciate your sending them as soon as possible.

Thanking you, I am,

Very truly yours,

CUNNINGHAM & WILKINS


D. RICHARD BOUNDS

DRB:eb

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 3160

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon G.W. WHITE, d/b/a/ G.W. WHITE CONSTRUCTION CO.

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-----

~~G.W. WHITE, d/b/a/ G.W. WHITE CONSTRUCTION COMPANY~~-----, Defendant-----

by WARREN NORVILLE-----

-----, Plaintiff-----

Witness my hand this 9th-----day of March-----1957-----

Alvin J. Duck-----, Clerk

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 3160

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon G.W. WHITE, d/b/a/ G.W. WHITE CONSTRUCTION CO.

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

G.W. WHITE, d/b/a/ G.W. WHITE CONSTRUCTION COMPANY, Defendant

by WARREN NORVILLE

Plaintiff

Witness my hand this 9th day of March 1957

David J. White, Clerk

CUNNINGHAM AND WILKINS
ATTORNEYS AT LAW
709 MERCHANTS NATIONAL BANK BUILDING
MOBILE 11, ALABAMA

ROBERT T. CUNNINGHAM
ROBERT B. WILKINS
D. RICHARD BOUNDS

April 12th, 1957

TELEPHONE
HEMLOCK 8-2478

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

Re: Warren Norville & Frank D. Santa Cruz
vs. G. W. White, d/b/a as G.W.White
Construction Co.

Dear Mrs. Duck:

Enclosed is the corrected complaint in the above styled
cause.

I would appreciate your re-filing this complaint.

Yours very truly,

CUNNINGHAM & WILKINS


D. RICHARD BOUNDS

DRB:eb
Encl.

WARREN NORVILLE and FRANK D.
SANTA CRUZ,

Plaintiffs,

-Vs-

G. W. WHITE, doing business as
G. W. WHITE CONSTRUCTION COMPANY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

No. _____

COUNT ONE

The Plaintiffs claim of the Defendant the sum of THREE HUNDRED FIFTY FOUR AND 82/100 (\$354.82) DOLLARS due from him by account due on January 1st, 1957, which sum of money, with the interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is attached hereto as Exhibit "A" and made a part hereof.

CUNNINGHAM & WILKINS
Attorneys for Plaintiff
709 Merchants Bank Bldg.
Mobile, Alabama

By: *D. Richard Bounds*
D. RICHARD BOUNDS

Defendant's address:

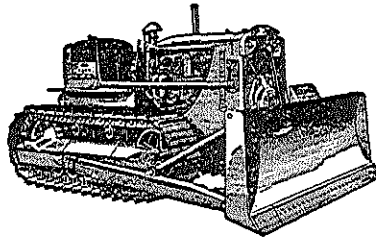
P.O. Box 126
Foley, Alabama

WARREN NORVILLE

CONTRACTOR

EXHIBIT "A"

BULLDOZING
GRADING



CLEARING
EXCAVATING

TELEPHONE GR 7-7641

MOBILE, ALA.

In Acct With:
Mr. G. W. White
dba G. W. White Construction Co.
Magnolia Springs, Ala.

Feb 24, 1957

For the account of Morville Santa Cruz Paving Co.

June 7, 1956 Paving at Gulf Service Station
Foley, Ala. Contract amount
Received on account
Balance this contract.

\$588.00
488.00
\$100.00

\$100.00

June 8, 1956 Surface treatment of road at
Magnolia Springs Telephone Exchng.
Magnolia Springs, Ala. Contract
Additional work at request of
Mr. White, Sept. 1956

\$225.00

29.82

\$254.82

\$ 254.82
\$354.82

Balance this contract.
TOTAL BALANCE DUE

State of Alabama,
County of Mobile.

Before me, the undersigned authority, on this day personally appeared Warren Norville, known to me, who being duly sworn, upon his oath states that the attached account in favor of Warren Norville & Frank D. Santa Cruz; and against H.W. White d/b/a H.W. White Construction Co., in the sum of \$ 354.82 is correct and just; that payment thereof is due and has not been received; that credit has been duly given for all payments and just and lawful offsets to which said account is entitled; that he has personal knowledge of said facts, and that he is duly authorized to make affidavit thereto.

Warren D. Norville

Sworn to and subscribed before
me this 8th day of March,
1957.

D. Richard Bounds
Notary Public in and for Mobile
County, Alabama.

SUMMONS AND COMPLAINT

Moore Printing 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 G. W. White, d/b/a G. W. White
Construction Company

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 G. W. White d/b/a
G. W. White Construction Company, Defendant.

by Warren Norville & Frank D. Santa Cruz, Plaintiff.

Witness my hand this 13th day of April 1957.

Alice J. White, Clerk