

CRANE CO., a Corporation,
Plaintiff,

v.

A. B. LEE, individually and
doing business as
A. B. LEE PLUMBING & HEATING
COMPANY, jointly and separately,
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW

NO.

3558

COUNT ONE

Plaintiff claims of the Defendant One Thousand, Two Hundred Eighty-eight and 92/100 (\$1,288.92) Dollars due from him by account on, to-wit, the 1st day of February, 1958, which sum of money, together with the interest thereon, is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant One Thousand, Two Hundred Eighty-eight and 92/100 (\$1,288.92) Dollars due from him on account stated between the Plaintiff and the Defendant on, to-wit, the 1st day of February, 1958, which sum of money, together with the interest thereon, is still unpaid.

COUNT THREE

The Plaintiff claims of the Defendant One Thousand, Two Hundred Eighty-eight and 92/100 (\$1,288.92) Dollars due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant during the months of July, August, September, October, November and December, 1957, and January, 1958, which sum of money,

SUMMONS AND COMPLAINT

Moore Prg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 3558

TERM, 19

COUNTY SHERIFF C. STATE OF ALABAMA:

You Are Hereby Comanded to Summon A.B. LEE, individually and doing business
as A.B. LEE PLUMBING & HEATING Company, jointly and
separately,

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

A.B. Lee, Inc. & d/b/a, Defendant

by CRANE CO., a corporation
Plaintiff

Witness my hand this 27 day of May 19 58

E. J. [unclear]
May 21, 1958

205 *Miss J. [unclear]*, Clerk

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY
ATTORNEYS AT LAW

3558

NINTH FLOOR MERCHANTS NATIONAL BANK BUILDING
HEMLOCK 3-5561 P. O. BOX 1070
MOBILE 6, ALABAMA

GESSNER T. MCCORVEY
BEN D. TURNER
C. M. A. ROGERS (1891-1957)
C. A. L. JOHNSTONE, JR.
R. F. ADAMS
JAMES L. MAY, JR.
ALEX T. HOWARD, JR.
CHAUNCEY MOORE
J. JEPHTA HILL
CHARLES B. BAILEY, JR.

May 26, 1958

Honorable Alice J. Duck
Clerk of the Circuit Court
Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed please find the original and one copy of a complaint, together with copies of the itemized verified account, which we request that you file in behalf of Crane Co. against A. B. Lee of Foley, Alabama.

Very truly yours,

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By Charles B. Bailey, Jr.
Charles B. Bailey, Jr.

CBBjr:fe

Enclosure

CRANE COMPANY, A Corporation.

IN THE CIRCUIT COURT OF

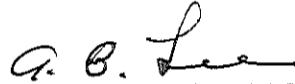
VS.

BALDWIN COUNTY, ALABAMA

AT LAW. Case No. 3558

A. B. LEE, Ind. and doing
business as A. B. LEE PLUMBING
& Heating Co., Jointly & Separately

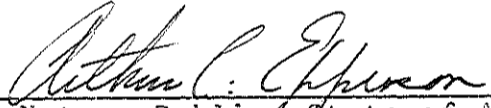
Before me the undersigned authority, personally
appeared A. B. Lee, who first being duly and legally sworn
doth depose and say on oath as follows: that he is the defendant
in the above styled case; that he does not possess any assegs
individually or jointly including choses in action, notes,
bonds and accounts, real, personal or mixed property other
than \$9.86 cash.



Affiant- Defendant

Sworn to and subscribed before me on this the

7th day of January, 1961.



Notary Public, State of Alabama
at large.

CRAE COMPANY, A Corporation,
Plaintiff.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

vs;

AT LAW, CASE NO. 3558

A.B. LEE, Individually and
doing business as
A.B. LEE PLUMBING & HEATING
COMPANY, Jointly & Separately.

NOTICE TO DEFENDANT

TO: A.B. LEE, Individually and doing business as A.B. LEE PLUMBING
and HEATING COMPANY, Jointly & Separately.

Take notice that upon the written request of McCorvey, Turner, Johnstone,
Adams, & May, Attorneys for the 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 the assests of A.B. Lee Plumbing & Heating
Company, 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 29 day of November, 1960.

Clerk of the Circuit Court.

CRANE COMPANY,
a corporation,

Plaintiff,

vs.

A. B. LEE, individually and
doing business as
A. B. LEE PLUMBING & HEATING
COMPANY, jointly and separately,

Defendant.

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
) AT LAW NO. 3558

Comes now the plaintiff in the above styled cause and shows that on, to-wit, the 21st day of July, 1958, judgment in the above styled cause was recovered by the plaintiff against the defendant, A. B. Lee, individually and doing business as A. B. Lee Plumbing & Heating Company, in the amount of One Thousand Three Hundred Fourteen and 70/100 (\$1,314.70) Dollars; that execution thereon was duly issued by this Court upon said judgment; and that said execution has been returned with the endorsement, "No Property Found."

WHEREFORE, plaintiff hereby requests that the Clerk of this Court shall issue a notice to the defendant requiring him to file in this Court within thirty days from the service of such notice, a statement in writing under oath of all of the assets of said defendant, 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 list or statement of any or all liens, mortgages or encumbrances thereon showing the amounts due on each, and the owner or holder of such liens, encumbrances or mortgages, all pursuant to the provisions of the Alabama Code of 1940, Title 7, Section 903.

McCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By Charles B. Bailey, Jr.
Attorneys for Plaintiff

Defendant's address:
Foley, Alabama

FILED
NOV 29 1958
ALICE I. DUCK, CLERK REGISTER

CRANE COMPANY,
a corporation,

Plaintiff,

vs.

A. B. LEE, individually and
doing business as
A. B. LEE PLUMBING & HEATING
COMPANY, jointly and separately,

Defendant.

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

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MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By Charles B. Bailey, Jr.
Attorneys for Plaintiff

Defendant's address:
Foley, Alabama

FILED
NOV 22 1958
ALICE J. DUCK, CLERK
REGISTER

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY
ATTORNEYS AT LAW

NINTH FLOOR MERCHANTS NATIONAL BANK BUILDING
HEMLOCK 3-5561 P. O. BOX 1070
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JAMES L. MAY, JR.
ALEX T. HOWARD, JR.
J. JEPHTA HILL
CHARLES B. BAILEY, JR.
C. M. A. ROGERS, III

November 28, 1960

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

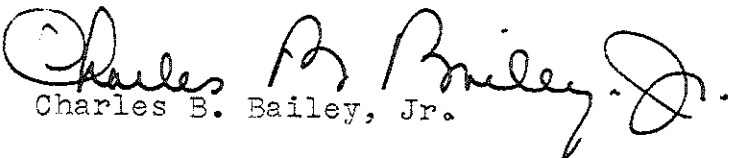
Re: ~~Crane Company vs.~~
A. B. Lee #355B

Dear Mrs. Duck:

Enclosed herewith is our firm check in the amount of \$19.45 in payment of the court costs incurred in the above styled matter.

In addition to the foregoing, we are enclosing herewith a petition for writ of discovery, which we will appreciate your causing to be issued.

Very truly yours,


Charles B. Bailey, Jr.

CBBjr/nmt

together with the interest thereon, from, to-wit, the 1st day of February, 1958, is still unpaid.

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By Charles B. Bailey, Jr.
Attorneys for Plaintiff

This suit is based upon an itemized account which is verified by affidavit.

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By Charles B. Bailey, Jr.
Attorneys for Plaintiff

Defendant's Address:

Foley, Alabama