

SUMMONS

3647

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon MARY GREGG, 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, Alabama, at Bay Minette, Alabama, against MARY GREGG, by REYNOLDS BROTHERS LUMBER CO., a partnership composed of J.P. REYNOLDS and M.S. REYNOLDS.

Witness my hand this the 6 day of September, 1958.

Americ J. French
Clerk

CC

COMPLAINT

REYNOLDS BROTHERS LUMBER CO.,)
a partnership composed of J.P.)
REYNOLDS and M. S. REYNOLDS,)
)
PLAINTIFF)
)
VS:)
)
MARY GREGG)
)
DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT I:

The plaintiff claims of the defendant SIX HUNDRED NINETEEN & 05/100 DOLLARS (\$619.05), due by promissory note made by her on the 23rd day of July, 1957, and payable on the 15th day of November, 1957, with interest thereon.

Said note provides for a reasonable attorney's fee which the plaintiff alleges to be \$125.00.

COUNT II:

The plaintiff claims of the defendant ONE HUNDRED FORTY TWO & 11/100 DOLLARS (\$142.11), due from her by account on, to wit; the 15th day of November, 1957, which sum of money, with interest thereon is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE HUNDRED FORTY TWO & 11/100 DOLLARS (\$142.11), due from her on account stated between the plaintiff and the defendant on, to wit: the 15th day of November, 1957, which sum of money, with interest thereon, is still unpaid.

COUNT IV:

The plaintiff claims of the defendant ONE HUNDRED FORTY TWO & 11/100 DOLLARS (\$142.11), due from her for merchandise, goods and chattels sold by the plaintiff to the defendant, on to wit: the 15th day of November, 1957, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account, as of the 3rd day of September, 1958.


Attorney for Plaintiff

Defendants address is:
27 Pecan Street
Fairhope, Alabama

AFFIDAVIT OF J. P. REYNOLDS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

J. P. REYNOLDS, first being duly sworn, deposes and says as follows:

My name is J. P. REYNOLDS; I am a partner in REYNOLDS BROTHERS LUMBER CO., a partnership composed of J.P. REYNOLDS and M.S. REYNOLDS, Foley, Alabama; I know that MARY GREGG owes REYNOLDS BROTHERS LUMBER CO. the sum of ONE HUNDRED FORTY TWO & 11/100 DOLLARS (\$142.11) after allowing all just credits.

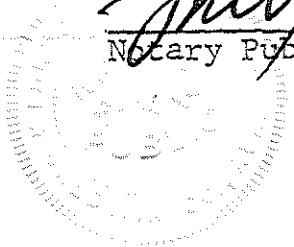


J.P. REYNOLDS- Partner

Sworn to and subscribed before
me, a Notary Public, this the
3rd day of September, 1958.



Notary Public



received 36 day of Sept 1958
ed on 36 day of Sept 1958
serve 36 day of the within 36
Mary Gregg

Service on _____

TAYLOR WILKINS, Sheriff
By W. H. Feltner D. S.

at Fairhope

Sheriff claims 20 miles at
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY W. H. Feltner
DEPUTY SHERIFF

3647

RECORDED

SUMMONS AND COMPLAINT

REYNOLDS BROTHERS LUMBER CO.
a partnership composed of
J.P. REYNOLDS and M.S. REYNOLDS

VS:

MARY GREGG

FILED

SEP 6 1958

AUGUST J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA