

H. ENGLAND, individually,
and d/b/a H. ENGLAND LUMBER
COMPANY,

Plaintiff

vs.

L. R. PHILLIPS,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

3788

AMENDED BILL OF COMPLAINT

Comes now the Plaintiff in the above styled cause and amends
the Bill of Complaint heretofore filed in this cause to read as
follows:

H. ENGLAND, individually,
and d/b/a H. ENGLAND LUMBER
COMPANY,

Plaintiff

vs.

L. R. PHILLIPS, individually,
and BERTHA PHILLIPS, individ-
ually,

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendants the sum of \$350.83 due
from them by account on the 26th day of September, 1957, which sum
of money, with interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendants the sum of \$350.83 due
from them for materials and labor furnished to Defendants by the
Plaintiff, at their request, from the 26th day of September, 1957,
to the 26th day of September, 1958, which sum of money, with in-
terest thereon, is still unpaid.

FILED
FEB 16 1960

ALICE J. DUCK, Clerk

James M. Baird
ATTORNEY FOR PLAINTIFF

1 mi. So. Stapleton
Highway 59
#3788

H. ENGLAND, individually,
and d/b/a ENGLAND LUMBER
COMPANY,

Plaintiff

vs.

L. R. PHILLIPS, individually,
and BERTHA PHILLIPS, indiv-
idually,

Defendants

AMENDED BILL OF COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FEB 16 1960

FEB 16 1960

ALICE L. DUCK, Clerk

Received 16 day of Feb 1960
and on 17 day of Feb 1960
served a copy of the within Amended Complaint
in Bertha Phillips
By service on Bertha Phillips

TAYLOR WILKINS, Sheriff
By W. O. Garner D

Saxley

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

By Taylor Wilkins
DEPUTY SHERIFF

H. ENGLAND, Individually, and
d/b/a H. ENGLAND LUMBER
COMPANY,

Plaintiff,

VS.

L. R. PHILLIPS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 3788

P L E A S

Comes the defendant in the above styled cause, and, for answer to the complaint heretofore filed in said cause and to each and every count thereof, separately and severally, sets down and assigns the following separate and several pleas:

1. The allegations of said complaint are untrue.

J. H. A. Madburn
ATTORNEY FOR DEFENDANT

Defendant demands that this cause be tried by a jury.

Filed
4-23-29

J. H. A. Madburn
ATTORNEY FOR DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. 3788

H. ENGLAND, Individually, and
d/b/a H. ENGLAND LUMBER COMPANY,

Plaintiff,

VS.

L. R. PHILLIPS,

Defendant.

PLEAS

FILED
APR 27 1980
ALICE J. DUCK, CLERK
RECORDED

STATE OF ALABAMA
BALDWIN COUNTY

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon L. R. Phillips to appear and answer, plead or demur, within thirty days from the service of this writ, to a Bill of Complaint filed against him by H. England, d/b/a H. England Lumber Company, in the Circuit Court of Baldwin County, at Law, for said state.

Herein fail not. Due return of this writ make as the law directs.

Witness my hand this the 9 day of March, 1959.

Alice J. Duck
REGISTER

64-3-25-59
H. England, individually, and
d/b/a H. England Lumber Company,

Plaintiff

vs.

L. R. Phillips,

Defendant

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

COUNT ONE:

The Plaintiff claims of the Defendant the sum of \$350.83 due from him by account on the 26th day of September, 1957, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of \$350.83 due from him for materials and labor furnished to Defendant by Plaintiff, at his request, from the 26th day of September, 1957, to the 26th day of Sept., 1958, which sum of money, with the interest thereon, is still unpaid.

James M. Bailey
ATTORNEY FOR PLAINTIFF

Verified and itemized statement of
account attached to original hereof.

3788
H. England, individually,
and d/b/a H. England Lumber
Company,

Plaintiff

vs.

L. R. Phillips,

Defendant

SUMMONS AND COMPLAINT

ON THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Defendant lives at
Loxley, Alabama

FILED

MAR 9 1959

ALICE L. DUCK, CLERK
REGISTER

Received 9 day of Mar 1959
at 25 day of March 1959
I see of the within R & C
on L. R. Phillips

By service on

TAYLOR WILKINS, Sheriff

By Edmund Steadman
28 mi

Sheriff claims 28 miles in
Ten Cents per mile 280
TAYLOR WILKINS, Sheriff
BY Edmund Steadman
DEPUTY SHERIFF

STATEMENT

H. ENGLAND LUMBER COMPANY

LUMBER . PAINT . BUILDING SUPPLIES

ROBERTSDALE, ALABAMA

Mr. L.R. Phillips
Lexley, Ala.

INVOICE NO.	CHARGES	CREDIT	BALANCE
9-22-57	A09856	\$57.02	
13-	A09884	4.67	
26-	A10024	289.14	\$350.83

STATE OF ALABAMA - BALDWIN COUNTY:

Before me, the undersigned authority, personally appeared H. England, who first being duly sworn, states that the foregoing is a true and accurate statement of the account and that there are no off-sets or counter-claims against the same.

Sworn and subscribed to before me the 2nd of March, 1959.

H. England
James M. Smith
NOTARY PUBLIC