

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

September 28, 1959

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

Re: Silas R. Fell
Vs: John W. Nelson
Case #3834

Dear Mrs. Duck:

Request judgment by default on itemized and verified
statement of account for the balance of \$435.00, defendant
having paid the difference.

Yours very truly,



EGR/bs
cc: John W. Nelson

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA
May 8, 1959

P. O. B.
BOX 71

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Silas R. Fell
vs
John W. Nelson

With this we are handing you summons and complaint in
the above styled case. Please process and have Sheriff
service this claim, and notify when served.

Yours very truly,



EGR/eb

enc. 1

cc: Sheriff Wilkins
cc: Mr. Silas R. Fell
1469 Victoria St.
Lincoln Park, Mich.

NOTE: we are also enclosing \$25.00 check from Fells
for Court Cost. EGR

SILAS R. FELL

PLAINTIFF

-VS-

JOHN W. NELSON

DEFENDANT

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

C O M P L A I N T

COUNT 1


The Plaintiff claims of the Defendant SIX HUNDRED SEVENTY FIVE AND NO/100(\$675.00) due from it by account on the 3th February 1958; which sum of money with interest thereon is still unpaid.

COUNT 11


The Plaintiff claims of the Defendant SIX HUNDRED SEVENTY FIVE AND NO/100(\$675.00) due from money loaned by the Plaintiff to the Defendant February 8, 1958.

COUNT 111

The Plaintiff claims of the Defendants SIX HUNDRED SEVENTY FIVE AND NO/100(\$675.00) due him on account stated between the Plaintiff and the Defendant on, to-wit, March 1958; which sum of money with the interest thereon is still unpaid.


E. G. Rickarby, Attorney for
the Plaintiff.

Note: the account sued on is evidenced by an itemized and verified statement of account, filed herewith.


E. G. Rickarby, Attorney for
the Plaintiff

VERIFICATION FOR STATEMENT OF ACCOUNT

STATE OF ~~Alabama~~ MICHIGAN
WAYNE
~~XXXXXXXX~~ COUNTY

Before me, the undersigned Notary Public, personally appeared SILAS R. FELL, who being duly sworn, deposes and says, he is the owner of the attached account and that the attached account is a correct statement of account between SILAS R. FELL and JOHN W. NELSON, and that there is owing from said JOHN W. NELSON the sum of SIX HUNDRED SEVENTY FIVE and NO/100 (\$675.00) with interest from February 3, 1958.

Silas R. Fell
AFFIANT

Subscribed and sworn to before me on this the 5th day of May, 1959.

Donald H. White
Notary Public Wayne County, Michigan

My Commission expires July 18, 1962.

Fairhope, Alabama

April 29, 1959

STATEMENT* IN THE MATTER OF LOAN TO: JOHN W. NELSON
FROM: SILAS R. FELL

AMOUNT OF LOAN: \$700.00

Less one payment- 25.00

Now due- \$675.00

This money was borrowed for the purpose of buying Fish Nets,
and is evidenced by a cancelled check.

SILAS R. FELL

*Mr. John W. Nelson paid me \$25.00
in ~~the~~ March 1958*

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 JOHN W. NELSON

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 _____

JOHN W. NELSON

_____, Defendant

by SILAS R. FELL

_____, Plaintiff

Witness my hand this 11 day of May 1959

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Exp. May 28 1959

Arthur J. Huch, Clerk

No. 3834

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

SILAS W. FELL

Plaintiffs

vs.

JOHN W. NELSON

Defendants

Summons and Complaint

Filed 5-11 19 59

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley Route, Bon Secour, Ala.

Received In Office

May 11 19 59

Sheriff

I have executed this summons

this 28 May 19 59
by leaving a copy with

John W. Nelson

86
Total \$ 8.60
TAYLOR WILKINS, Sheriff
BY Edleigh Stedman
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Edleigh Stedman Deputy Sheriff

Bon Secour, Ala