

LAW OFFICES
JAMES A. BRICE
FOLEY, ALABAMA

JAMES A. BRICE
RICHARD C. LACEY

P. O. Box 298
WHITEHALL 3-3601

December 10, 1959

3877

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

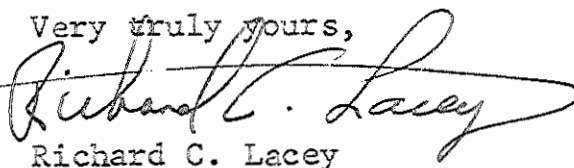
Re: The Ebert Agency, a co-partnership
composed of Charles J. Ebert and
Charles J. Ebert, Jr.
vs: G. W. White, Jr.

Dear Mrs. Duck:

We find that Title 7, Section 201 Code of Alabama,
1940, provides for service of process upon a non-resident
by registered mail in a civil matter.

We are enclosing the affidavit in support of service
by this method.

Very truly yours,


Richard C. Lacey

RCL/vd

Enclosure

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

February 4, 1960

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

3817

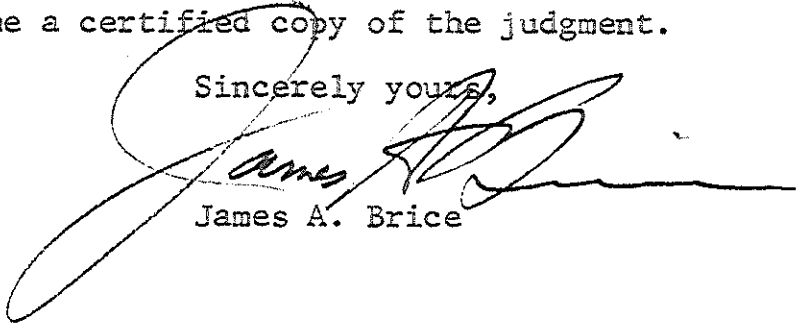
Re: Ebert Agency
vs: G. W. White, Jr.

Dear Mrs. Duck:

Please place this file before Judge Hall for judgment by default for the Plaintiff for \$598.10 principal, and \$89.72 interest, a total of \$687.82.

Please send me a certified copy of the judgment.

Sincerely yours,


James A. Brice

JAB/vd

SUMMONS

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA-----GREETINGS:

You are hereby commanded to summons G. W. White Jr. to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of The Ebert Agency, a co-partnership composed of Charles J. Ebert and Charles J. Ebert Jr.

Witness my hand this 18 day of June, 1959.

Reed J. Ebert
CLERK

COMPLAINT

The Ebert Agency, a co-partner-
ship composed of Charles J.
Ebert and Charles J. Ebert Jr.
Plaintiff
VS
G. W. White Jr.,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

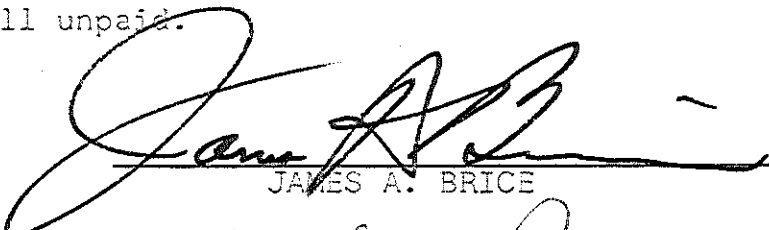
I

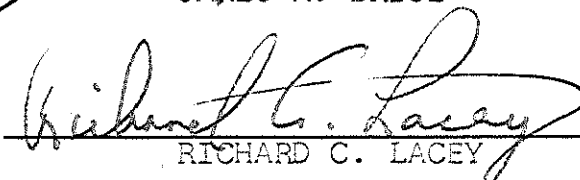
The Plaintiff claims of the Defendant Five Hundred Ninety Eight Dollars and Ten Cents (\$598.10), due from him on account, to wit: the 27th day of August, 1957, which sum of money, with interest thereon, is still unpaid.

II

The Plaintiff claims of the Defendant Five Hundred Ninety Eight Dollars and Ten Cents (\$598. 10), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 27th day of August, 1957, which sum of money, with in-

terest thereon, is still unpaid.


JAMES A. BRICE


RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

There is attached hereto as Exhibit A and made a part hereof, an itemized statement of account verified by affidavit of Charles J. Ebert, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 27th day of August, 1957, and due at present.

The Defendant resides at ^{Magnolia Springs} ~~Forey~~, Alabama

FILED

6-18-59

ALICE J. DUCK, CLERK
REGISTER

SHEET NO. _____

BROKER_____

145

STATE OF ALABAMA)
BALDWIN COUNTY)

Before me, Richard C. Lacey, a Notary Public in and for said County in said State, personally appeared Charles J. Ebert, a partner of the Ebert Real Estate Agency, who, being by me first duly sworn, deposes and says that the annexed statement of the account of said Ebert Real Estate Agency against G. W. White is just, true and correct; that there is now due on said account the sum of Five Hundred Ninety-eight Dollars and Ten Cents after deducting all credits, set-offs or counterclaims.

EBERT REAL ESTATE AGENCY

BY: Charles J. Ebert

Partner

Sworn to and subscribed before me this 17 day of June, 1927.

Witness my hand and official seal.

Richard C. Lacey
NOTARY PUBLIC

70. 3877

The Ebert Agency

vs.

G. W. White, Jr.

Received 19 day of June 1952

and on day of 19

I served a copy of the within

on G. W. White, Jr.

By service on

TAYLOR WILKINS, Sheriff

By D. S.

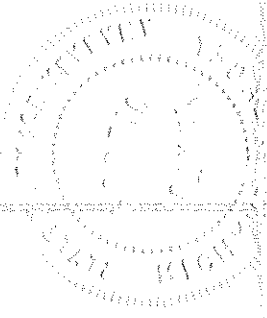
Not Found

Returned 20 day of July 1952

Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff

By Deputy Sheriff



FILED

6-18-52

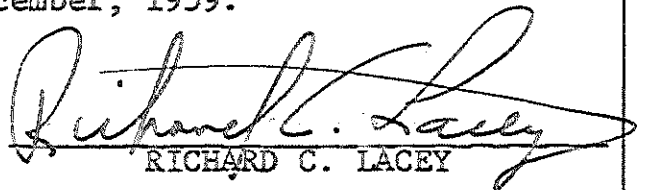
ALICE I. DUCK, CLERK REGISTER

A F F I D A V I T

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Before me, James A. Brice, a Notary Public in and for said County and State, personally appeared Richard C. Lacey, who, after being duly sworn, deposes and says: that he is the attorney for the Plaintiff in that certain action pending in the Circuit Court of Baldwin County, Alabama, styled as The Ebert Agency, a co-partnership composed of Charles J. Ebert and Charles J. Ebert, Jr. VS. G. W. White, Jr.; that the defendant in said cause was a resident citizen of Baldwin County, Alabama at the time of the filing of the cause; that the said defendant, G. W. White, Jr., moved from Baldwin County and the State of Alabama before service could be perfected; that the said G. W. White, Jr. now resides at Route 1, Winchester, New Hampshire; that he believes the said defendant, G. W. White, Jr. to be over the age of twenty-one (21) years.

DONE this 10th day of December, 1959.


RICHARD C. LACEY

Sworn to and subscribed before me
on this the 10th day of December, 1959.


NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

FILED

DEC 10 1959

ALICE L. DUCK, CLERK
REGISTER