

OLIVE MAE LOWELL  
and CAROL L. LOWELL,  
IND., and Jointly

Plaintiff

VS

WILMER TAYLOR

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

4496

COUNT 1

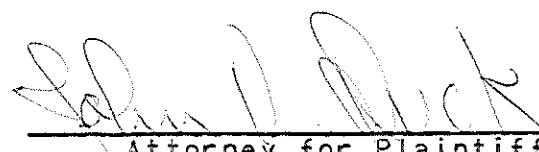
Plaintiff claims of the Defendant the sum of ONE THOUSAND THREE HUNDRED and SIXTY SIX (\$1,366.00) DOLLARS due from him by an open account from on to-wit: the 30th day of October, 1958, until on to-wit: the 17th day of April, 1959, which sum of money together with the interest thereon is still unpaid.

COUNT 2

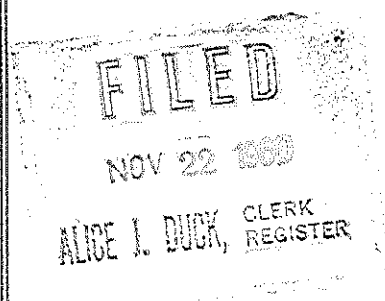
Plaintiff claims of the Defendant the sum of ONE THOUSAND THREE HUNDRED and SIXTY SIX (\$1,366.00) DOLLARS, due from him by an account stated between the Plaintiff and the Defendant on the 22nd day of August, 1960, which sum of money with the interest thereon is still unpaid.

COUNT 3

Plaintiff claims of the Defendant the sum of ONE THOUSAND THREE HUNDRED and SIXTY SIX (\$1,366.00) DOLLARS, for merchandise, goods and chattles sold by the Defendant from on to-wit: the 30th day of October, 1958 until on to-wit: the 17th day of April, 1959, which sum of money, with the interest thereon is still unpaid.

  
Attorney for Plaintiff

Defendant may be served at  
Montrose, Alabama



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 WILMER TAYLOR

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 WILMER TAYLOR

\_\_\_\_\_, Defendant.

by OLIVE MAE LOWESS and CAROL L. LOWELL, IND., and JOINTLY

\_\_\_\_\_, Plaintiff.

Witness my hand this 22 day of Nov 1960

Becky J. Smith, Clerk

Ed-11-28-60

No. 4496 Page \_\_\_\_\_

The State of Alabama

Baldwin County

CIRCUIT COURT

OLIVE MAE LOWELL, and

CAROL L. LOWELL, Ind. and  
Jointly Plaintiffs

vs.

WILMER TAYLOR

Defendants

Summons and Complaint

Filed \_\_\_\_\_

**FILED**

NOV 22 1960

19 \_\_\_\_\_

ALICE J. DUCK, CLERK  
REGISTER Clerk

John V. Duck

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Montrose, Alabama

Received In Office

19 \_\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this 28 Nov 19 60

by leaving a copy with

Wilmer Taylor

Sheriff claims 55

miles at

Ten Cents per mile Total \$ 5.50

TAYLOR WILKINS, Sheriff

BY

Garner  
DEPUTY SHERIFF

Taylor Wilkins Sheriff  
W. O. Garner Deputy Sheriff  
Montrose

OLIVE MAE LOWELL &  
CAROL L. LOWELL, Individ-  
idually and Jointly,

Plaintiff,

VS

WILMER TAYLOR,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW.

PLEAS

Comes the Defendant, WILMER TAYLOR, and offers the follow-  
ing separate and several pleas:

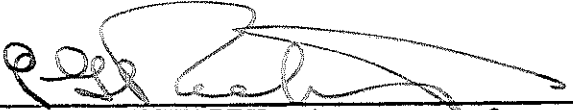
1. Not guilty.

2. The Defendant, for answer to said complaint, sayeth  
that he has paid the debt for the recovery of which this suit  
was brought before the action was commenced.

FILED

DEC 22 1960

ALICE A. DICK, CLERK  
REGISTER

  
E. G. RICKARBY, Attorney for  
Defendant.

**E. G. RICKARBY**

392 FAIRHOPE AVENUE  
FAIRHOPE, ALABAMA

December 20, 1960

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

Dear Mrs. Duck:

Inre: Olive Mae & Carol L. Lowell  
vs: Wilmer Taylor  
Non-jury Case #4496

Please file the enclosed pleas and oblige.

Yours very truly,



EGR/wr

Enc:

cc: Mr. John V. Duck