

STATE OF ALABAMA )

BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon PHARIS T. COLE and ETHEL A. COLE, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Mecia O. Thompson.

Witness my hand this the 3 day of February, 1960.

*Alvin H. Ketch*  
Clerk, Circuit Court, Baldwin County,  
Alabama.

MECIA O. THOMPSON,  
Plaintiff,

vs

PHARIS T. COLE and  
ETHEL A. COLE,  
Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

The Plaintiff claims of the Defendants the sum of THREE HUNDRED FIFTY & No/100 (\$350.00) DOLLARS, due by lease agreement made and entered into on the 1st day of January, 1959, and payable on the 1st day of October, 1959, with interest thereon, is due and unpaid.

The Plaintiff alleges that in and by the said lease agreement the Defendants agreed to pay all cost of collecting the said sum, including a reasonable attorney's fee, and the Plaintiff claims of the Defendant the further and additional sum of FIFTY (\$50.00) DOLLARS, as a reasonable attorney's fee in the premises.

The Plaintiff further alleges that in and by the said lease agreement the Defendants waived all right of exemption under the constitution and laws of the State of Alabama, as against the said debt and the Plaintiff claims the benefit of such waiver.

FILED

FEB 3 1960

ALICE L. DUCK, CLERK  
REGISTER

*John P. Beebe*  
Attorney for Plaintiff

4/62

Maria B. Thompson

VS.

Pharis J. Cole &

Ethel A. Cole

Resident near

Cooper's Store

Waynes

Received 3 day of Feb 1960

and on 27 day of Feb 1960

I served a copy of the within 290

on Pharis J. Cole

Ethel A. Cole

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By Camacho D. S.

Resident, Ala

Sheriff claims 52 miles at

Ten Cents per mile Total \$ 5.20

TAYLOR WILKINS, Sheriff

BY Taylor Wilkins  
DEPUTY SHERIFF

FILED  
FEB 3 1960  
ALICE J. DICK, CLERK  
REGISTER

JOHN P. BEEBE  
ATTORNEY AT LAW  
ROBERTSDALE, ALABAMA

February 2nd, 1960.

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

Dear Mrs. Duck:

I enclose original and two copies of summon and complaint in the matter of Mecia O. Thompson vs. Pharis T. Cole and Ethel A. Cole, to be filed in the Circuit Court of this County.

I am informed that Pharis T. Cole is now living in Rosinton near Cooper's Store and that Ethel A. Cole is living in Loxley.

Yours very truly,

A handwritten signature in cursive script, reading "John P. Beebe", written in dark ink. The signature is fluid and extends across the width of the letter's body.

A PICARD, INC.,

Plaintiff

VS

W. N. STUCKEY LUMBER CO.,  
a corporation, W. N. STUCKEY,  
SR., WHIT N. STUCKEY, JR.,  
jointly and individually

Defendants

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: \_\_\_\_\_

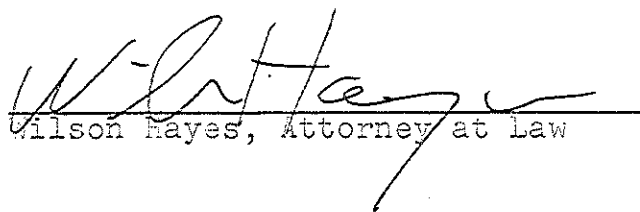
DEMURRER

Comes the defendants in the above styled cause and offers  
the following grounds of demurrer to plaintiffs' amended complaint:

1. That it does not appear from the amended complaint that  
defendants are jointly liable.
2. That it does not appear from the amended complaint that  
defendants are individually liable.
3. That the amended complaint is multifarious.

  
Wilson Hayes, Attorney for Defendants

Defendants demand trial by jury.

  
Wilson Hayes, Attorney at Law

4163

FILED

MAR 7 1960

ALICE J. DICK, CLERK OR  
REGISTER

## SUMMONS AND COMPLAINT

The State of Alabama,  
Baldwin County.

Circuit Court, Baldwin County

No. ....

February

TERM, 19 60

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon W. N. Stuckey Lumber Co., a corporation  
W. N. Stuckey, Sr., and Whit N. Stuckey, Jr.

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 W. N. Stuckey  
Lumber Co., a corporation, W. N. Stuckey, Sr., Whit N. Stuckey, Jr.  
by A. Picard, Inc.

Plaintiff

Witness my hand this 3 day of February 19 60.

Clerk

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

The State of Alabama  
Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed \_\_\_\_\_ 19\_\_\_\_

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Plaintiff's Attorney

\_\_\_\_\_  
Defendant's Attorney

\_\_\_\_\_  
Defendant lives at

\_\_\_\_\_  
Received In Office

\_\_\_\_\_  
19\_\_\_\_

\_\_\_\_\_  
Sheriff

I have executed this summons

this \_\_\_\_\_ 19\_\_\_\_

by leaving a copy with

\_\_\_\_\_  
Sheriff

\_\_\_\_\_  
Deputy Sheriff

A. PICARD, INC.,  
Plaintiff

vs.

W. N. STUCKEY LUMBER CO.,  
a corporation, W. N. STUCKEY,  
SR., WHIT N. STUCKEY, JR.,  
jointly and individually,

Defendants

IN THE CIRCUIT COURT OF

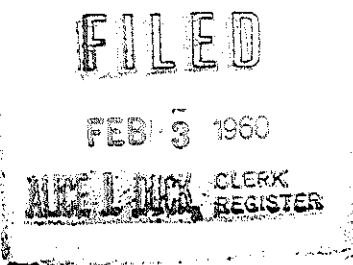
BALDWIN COUNTY, ALABAMA

IN LAW No. \_\_\_\_\_

The plaintiff claims of the defendants the sum of  
TWO HUNDRED AND FIFTY and no/100(\$250.00)DOLLARS, due by  
promissory note made by them on the 23rd day of July, 1959,  
payable on demand, with interest thereon at the rate of  
seven (7) percent per annum.

Plaintiff alleges that in and by the terms of said  
note, the defendants waived all rights of homestead and exemption  
under the laws of the State of Alabama, and plaintiff claims  
the right of said waiver.

Plaintiff alleges that in and by the terms of said note,  
the defendants agreed to pay a reasonable attorney's fee  
in the event that the same should be secured or collected by  
suit, and plaintiff claims the further and additional sum of  
\$37.50 as a reasonable attorney's fee in the premises.



Attorney for Plaintiff



78523  
Received 3 day of Feb 1960  
and on 3 day of Feb 1960  
served a copy of the within S.L.C.  
on W. N. Stuckey Lbr. Co., Inc.  
By service on W. N. Stuckey

TAYLOR WILKINS, Sheriff  
By W. A. Talbot D. S.  
4 miles north of B.H.

Received 3 day of Feb 1960  
and on 3 day of Feb 1960  
served a copy of the within S.L.C.  
on W. N. Stuckey, Sr. & Whit  
N. Stuckey.  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. A. Talbot D. S.  
4 miles north of B.H.

Sheriff claims 24 miles at  
Ten Cents per mile Total \$ 2.40  
TAYLOR WILKINS, Sheriff  
Talbot  
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN LAW NO. 14163.

A. PICARD, INC.

Plaintiff

vs.

W. N. STUCKEY LUMBER CO.,  
INC., a corporation, W. N.  
STUCKEY, SR., WHIT N.  
STUCKEY, JR.,

Defendants

SUMMONS AND COMPLAINT

FILED  
FEB 3 1960  
ALICE J. DUCK, CLERK  
REGISTER

LAW OFFICES OF  
J. CONNOR OWENS, JR.  
101 COURTHOUSE SQUARE  
BAY MINETTE, ALABAMA