

BAY MINETTE BUILDING SUPPLY, )  
INC., a corporation, )  
VS. Plaintiff, )  
C. C. LINDSEY and CARROL LEE, )  
d/b/a Danceland, )  
Defendants. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 4305

AFFIDAVIT DENYING CORRECTNESS OF VERIFIED ACCOUNT

Now comes Carrol Lee, one of the defendants in the above  
entitled cause, and says that the itemized, verified account here-  
tofore filed in this cause is incorrect and that he disputes the  
said account in its entirety.

Carrol Lee  
Carrol Lee

Sworn to and subscribed before me  
on this the 19<sup>th</sup> day of April, 1961.

[Signature]  
Notary Public, Baldwin County,  
Alabama

FILED  
APR 20 1961  
ALICE J. DUCK, Clerk

AFFIDAVIT DENYING CORRECTNESS OF  
VERIFIED ACCOUNT.

BAY MINETTE BUILDING SUPPLY, INC.,  
a corporation,

Plaintiff,

VS.

C. C. LINDSEY and CARROL LEE,  
d/b/a Danceland,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

NO. 4305

BAY MINETTE BUILDING SUPPLY, )  
INC., a corporation, )

Plaintiff, )  
VS. )

C. C. LINDSEY and CARROL LEE, )  
d/b/a Danceland, )

Defendants. )

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 4305

Now comes the defendant, Carrol Lee, and for answer to the complaint heretofore filed in this cause says:

1. He is not now and has never been a member of a firm or partnership composed of C. C. Lindsey and Carrol Lee, d/b/a Danceland.

2. The allegations of the complaint are untrue.

*J. T. B. Thompson*  
Attorney for Defendant, Carrol Lee

STATE OF ALABAMA )  
\*  
COUNTY )

Before me, the undersigned authority, within and for said County in said State, personally appeared Carrol Lee, who, after being by me first duly and legally sworn, deposes and says: That the allegations of the foregoing instrument are true.

*Carrol Lee*  
Carrol Lee

Sworn to and subscribed before me on this the 19<sup>th</sup> day of April, 1961.

*[Signature]*  
Notary Public

FILED  
APR 20 1961  
ALICE J. DUCK, Clerk

ANSWER

BAY MINETTE BUILDING SUPPLY, INC.,  
a corporation,

Plaintiff,

VS.

C. C. LINDSEY and CARROL EEE,  
d/b/a Danceland,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 4305

FILED

APR 20 1961

ALICE J. DUCK, Clerk

## STATEMENT

## BAY MINETTE BUILDING SUPPLY, INC.

P. O. BOX 728

BAY MINETTE, ALABAMA

- Lanceland  
Hwy 31 South  
Bay Minette, Ala.

TERMS: NET 2% 10TH OF MONTH

| DATE            | FOLIO   | CHARGE | CREDIT | BALANCE |
|-----------------|---------|--------|--------|---------|
| BALANCE FORWARD |         |        |        |         |
| SEP 3           | 10 54 N | 39 95  |        |         |
|                 | 20 29 N | 28 84  |        |         |
| 4               | 20 48 N | 14 98  |        |         |
|                 | 20 63 N | 21 05  |        | 104 82  |

 PAY LAST  
 AMOUNT THIS COLUMN


STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon C. C. Lindsey and Carrol Lee 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 same, then and there to answer the complaint of the Bay Minette Building Supply, Inc., a corporation.

Witness my hand, this the 29 day of June, 1960.

Alice J. Duck  
CLERK

BAY MINETTE BUILDING SUPPLY,  
INC., A CORPORATION

PLAINTIFF

VS

C. C. LINDSEY and CARROL  
LEE d/b/a Danceland

DEFENDANTS

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 4305

.....

Plaintiff claims of the Defendants ONE-HUNDRED, FOUR and EIGHTY-TWO ONE-HUNDREDTHS (\$104.82) DOLLARS, due from them by account on the 4th day of May 1959 which sum of money with interest thereon, is still unpaid.

W. L. Hager  
Plaintiff files by verified itemized statement of account which statement is attached hereto.

**FILED**

JUN 29 1960

ALICE J. DUCK, Clerk

Carrol Lee may be served  
at 312 5th Street  
Chickasaw, Alabama

C.O. Lindsey may be served  
at Bay Minette, Alabama.

Sheriff claims 30 miles at

Ten Cents per mile Total \$3.00

TAYLOR WILKINS, Sheriff

BY

Talbert  
DEPUTY SHERIFF

Received 23 Day of March 1961

and on 28 Day of March 1961

I served a Copy of the within St C

in Carrol Lee

By service on

RAY D. BRIDGES, Sheriff

By B. J. Harris

Received 21 day of March 1961  
and on 21 day of March 1961  
I served a copy of the within St C  
on C. C. Lindsey

By service on

TAYLOR WILKINS, Sheriff  
By W. R. Talbert D. S.

Bromley

NUMBER: 4305

BAY MINETTE BUILDING SUPPLY  
INC., a corporation

PLAINTIFF

VS

C. C. LINDSEY and CARROL  
LEE

DEFENDANTS

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

JUN 29 1960

ALICE J. DUCK, Clerk

2602

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Wilson Hayes, a Notary Public  
in and for said County and State, personally appeared Claude  
Rogers, who, being first sworn, deposes and says:

I am the General Manager for the Bay Minette Building  
Supply, Inc., a corporation, and I have personal charge of the  
books and accounts of same; that the attached account is true and  
correct; that the whole and each item thereof is now due and pay-  
able, and that all just and lawful offsets, payments and credits  
have been allowed.

Claude Rogers  
Claude Rogers, General Manager

Sworn to and subscribed before me on this the 27<sup>th</sup> day  
of June, 1960.

W. L. Hayes  
Notary Public, Baldwin County, Ala.  
*Step of William P. Hayes*