

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon W. F. GODWIN and DEWEY GODWIN, 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, Alabama, at the place of holding same by BAIRD STEEL, INC., an Alabama corporation.

Witness my hand this the 20th day of March, 1961.

Alice J. Duck
Clerk

Ex 3-22-61

COMPLAINT

BAIRD STEEL, INC., an
Alabama corporation,

PLAINTIFF

VS:

W. F. GODWIN and DEWEY
GODWIN,

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendants TWO HUNDRED FORTY-NINE & 61/100 DOLLARS (\$249.61), due from them by account on, to wit: the 29th day of June, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendants TWO HUNDRED FORTY-NINE & 61/100 DOLLARS (\$249.61), due from them on account stated between the plaintiff and the defendant on, to wit: the 29th day of June, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendants TWO HUNDRED FORTY-NINE & 61/100 DOLLARS (\$249.61), due from them for merchandise, goods and chattels sold by the plaintiff to the defendants on, to wit: the 29th day of June, 1959, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 16th day of March, 1961.

Muel Plum
Attorney for Plaintiff

Address of the defendants:

Bay Minette, Alabama

FILED

MAR 20 1961

16 ALICE J. DUCK, CLERK
REGISTER

COUNTY OF Mobile.

SG-188 (13743)

STATE OF Alabama.

Be it remembered, that on this 16th day of March
A. D., 1961, personally appeared before me, the undersigned authority,
S. H. Waughman known to me
who being duly sworn, upon his oath stated that he is Secy-Treas
of Baird Steel, Inc.,
{ a corporation organized and doing business under the laws of the State of Alabama
{ and has been duly authorized by said corporation to make this affidavit
{ a partnership composed of _____
_____ a sole trader doing business as Fabricator of Reinforcing Steel
and that as such he makes this affidavit; that he is familiar with the books and business of
said Baird Steel, Inc.,; that the attached account against
W. F. & Dewey Godwin of Bay Minette, Alabama.
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
posing the said account were sold and delivered to said W. F. & Dewey Godwin
at { its } special instance and request, that credit has been duly given for all payments and
{ their }
{ his }
just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of Two Hundred forty nine & .61/100 Dollars
(\$ 249.61) with interest from June 29, 1959 is justly due and
remains unpaid.

S. H. Waughman X

I hereby certify under my official seal that I am authorized as a Notary Public to
administer oaths under the laws of the State of Alabama
and that the foregoing was subscribed and sworn to before me on the day and year
first above stated.

Will Farrow

Notary Public

County of Mobile State of Alabama
My commission expires May 4 A. D. 1963

STATEMENT

BAIRD STEEL, Inc.

REINFORCING STEEL — WIRE MESH — STEEL PRODUCTS — CORRUFORM

1622 NAVCO ROAD

MOBILE, ALABAMA

Phone Greenwood 9-1393

P. O. BOX 18

DATE March 16, 1961.

W. F. & Dewey Godwin.
 Bay Minette, Alabama.

TEAR OFF AND RETURN WITH CHECK TO INSURE PROPER CREDIT

DATE	INVOICE NO.	CHARGES	CREDITS	BALANCE DUE
BALANCE FORWARDED				
6/29/59	370	429.61		429.61
8/25/59			429.61	-00-
9/16/59	Check returned insufficient funds			
		429.61		429.61
10/7/59			100.00	329.61
10/26/59			329.61	-00-
11/4/59	Check returned insufficient funds			
		329.61		329.61
4/21/60			10.00	319.61
4/8/60			20.00	299.61
9/14/60			50.00	249.61
9/20/60	Check returned insufficient funds			
10/5/60			50.00	249.61

ALL ACCOUNTS ARE DUE AND PAYABLE ONLY TO BAIRD STEEL, INC.

INVOICE

P. O. BOX 18

TELEPHONE GREENWOOD 9-1393

MOBILE, ALABAMA

NO. 370

DATE June 29, 1959.

YOUR
ORDER No. _____

OUR
ORDER No. 448

SOLD TO W. F. & Dewey Godwin.

SHIPPED TO Shore Line Motel.

Bay Minette, Alabama.

Fort Walton Beach,

Florida.

[illegible]

✓ No. 4648
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

BAIRD STEEL, INC., an Alabama
corporation,

PLAINTIFF

VS:

W. F. GODWIN and DEWEY GODWIN,

DEFENDANTS

Received 21 day of March
and on 23 day of March 1961
I served a copy of the within + c
on W. F. Godwin
Dewey Godwin
By service on _____

TAYLOR WILKINS, Sheriff
By W. L. L. L. L. L. D.S.
O m u

FILED
MAR 20 1961
ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA