

4705

COMPLAINT

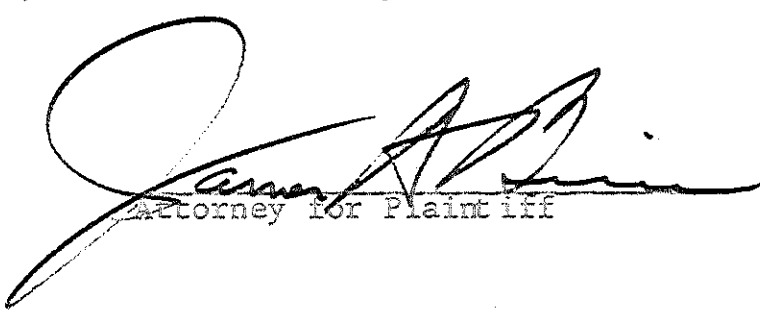
COASTAL CONCRETE COMPANY, INC.
Plaintiff

vs

HENRY MILLER d/b/a MILLER PLUMBING
COMPANY,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

The Plaintiff claims of the Defendant One Hundred Twenty-five and 66/100 (\$125.66) Dollars, due from him on account, to-wit: the 5th day of January, 1960, which sum of money, with interest thereon, is still unpaid.


Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof, an itemized statement of account verified by affidavit of R. J. Nye, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 28th day of May 1960.

FILED
MAY 18 1961
ALICE J. DUCK, CLERK
REGISTER

A F F I D A V I T

STATE OF ALABAMA)

COUNTY OF BALDWIN)

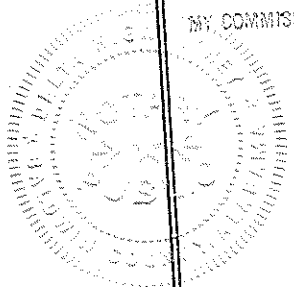
Before me, the undersigned, a Notary Public in and for said County in said State, personally appeared R. J. Nye, who being first duly sworn by me, deposes and says: That he is V. Pres- Mgr. of Coastal Concrete Company, Inc.; that the annexed statement of account of Coastal Concrete Company, Inc. against Miller Plumbing Company of Gulf Shores, Alabama, is just, true and correct; that there is now due on said account the sum of One Hundred Twenty Five and 66/100 (\$125.66) Dollars after deducting all credits, set-offs or counterclaims.

R. J. Nye
R. J. NYE

Sworn to and subscribed before me
on this the 28th day of May, 1960.

Debra H. Swastney
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

MY COMMISSION EXPIRES JULY 17, 1960



STATEMENT

ROBERTSDALE, ALABAMA,

3/24

1960

COASTAL CONCRETE COMPANY, Inc.

READY-MIX CONCRETE — CONCRETE BLOCKS

M. Miller Plumbing Co.
 Gulf Shores, Ala.

ROBERTSDALE, ALABAMA

U. S. 90, NORTH

PHONE WI 7-5946

1960

BAY MINETTE, ALA.

U. S. 31, SOUTH

PHONE 7670

Jaw 54 100 lb Cement

12566

Inv # 19593

COASTAL CONCRETE CO., INC.

ROBERTSDALE, ALA.

Ready-Mix Concrete

Concrete Blocks

Phone WI 7-5946

Customer's
Order No.

Date _____

19

Name

Address

[illegible]

All claims and returned goods MUST be accompanied by this bill.

19593

Rec'd By

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Henry Miller d/b/a Miller Plumbing Company

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 -----

Henry Miller d/b/a Miller Plumbing Company-----, Defendant-----

by Coastal Concrete Company, Inc.-----

-----, Plaintiff-----

Witness my hand this 14 day of May 1961

Deepest Resnick-----, Clerk

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Coastal Concrete Company, Inc.

Plaintiffs

vs.

Henry Miller d/b/a

Miller Plumbing Company

Defendants

Summons and Complaint

Filed _____ 19____

FILED

Clerk

MAY 18 1961

ALICE J. DUCK, CLERK REGISTER

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Gulf Shores, Alabama

Received In Office

May 18, 1961

Taylor Wilkins

Sheriff.

I have executed this summons

this May 18, 1961

by leaving a copy with

Henry Miller d/b/a
Miller Plumbing Co.

Sheriff claims 100 miles at

Ten Cents per mile Total \$ 10.00

TAYLOR WILKINS, Sheriff

BY G. C.
DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Orlando Adams

Deputy Sheriff.

Gulf Shores

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

June 23, 1961

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

Re: Coastal Concrete Company
Vs: Henry Miller
At Law No. 4705

Dear Mrs. Duck:

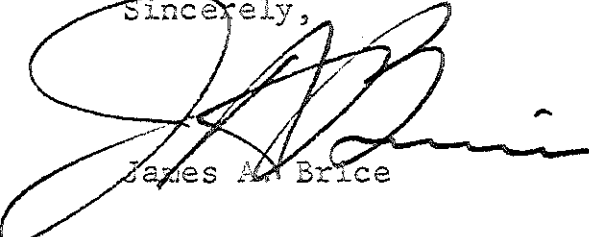
According to my records, the Plaintiff is entitled to judgment by default in the above case.

Please issue the document based on the following figures:

Principal	\$125.66
Interest	15.08
Attorney Fee	25.13
	\$140.74
	\$105.37

Thank you for your usual prompt attention to this matter.

Sincerely,



James A. Brice

JAB:j