

Defendant.

CASE NO. 5100

247

SCHUTTE AND WILLIAMS,
A Partnership composed of
GEORGE W. RANDALL, ROBERT I.
WILLIAMS, and GEORGE OLSEN,

Plaintiff,

-vs-

FAIRHOPE MEMORY GARDENS,
A Corporation,

Defendant.

X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

X

X

CASE NO.

5100

X

X

COUNT ONE

The Plaintiff claims of the Defendant Two Thousand Fifty (\$2,050.00) Dollars due from it by account from to-wit, April 9th, 1958 to to-wit, July 21st, 1960, which sum of money with the interest thereon is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant Two Thousand Fifty (\$2,050.00) Dollars due from it for work and labor done for the defendant by the plaintiff from to-wit, the 9th day of April, 1958 to to-wit, July 21st, 1960, at its request, which sum of money with interest thereon is still unpaid.

COUNT THREE

The Plaintiff claims of the Defendant Nine Hundred (\$900.00) Dollars, due from it by promissory note payable on demand, and demand having been made and the defendant having failed and refused to make payment and said payment now being due, which sum of money with the interest thereon is still unpaid.

Lyons, Pipes and Cook
LYONS, PIPES AND COOK
Attorneys for the Plaintiff

Defendant may be served at:

Fairhope Memory Gardens
Fairhope, Alabama

FILED

MAR 30 1962

ALICE J. DUCK, CLERK,
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5100

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Fairhope Memory Gardens, a Corp.

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

Fairhope Memory Gardens, A Corp., Defendant

by Schutte & Williams, a Partnership composed of George W. Randall xxx

Robert I. Williams, and George Olsen, Plaintiff

Witness my hand this 30th day of March 1962

Alice J. Newkirk Clerk

No. 5100

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THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

SCHUTTE & WILLIAMS, A partnership
composed of GEORGE W. RANDALL

ROBERT I. WILLIAMS & GEORGE OLSEN

vs. Plaintiffs

FAIRHOPE MEMORY GARDENS,
A Corporation

Defendants

SUMMONS and COMPLAINT

Filed March 30, 1962

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

3/30, 1962

, Sheriff

I have executed this summons

this 4/12, 1962

by leaving a copy with

George T. Faulkner, Manager,
Fairhope Memory Gardens

Sheriff claims 7.00 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY

W. C. Garner
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. C. Garner Deputy Sheriff

Fairhope

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

March 29, 1962

JOSEPH H. LYONS (1900-1957)
SAM W. PIPES, III
WALTER M. COOK
FRANK T. POPE, JR.
GORDON B. KAHN
IRWIN W. COLEMAN, JR.

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

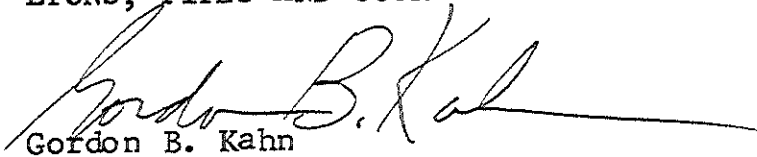
Re: Schutte & Williams v. Fairhope Memory Gardens

Dear Mrs. Duck:

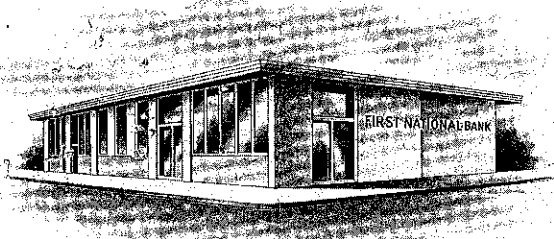
We enclose herewith an original and one copy of a complaint of Schutte and Williams v. Fairhope Memory Gardens, a corporation. We respectfully request that you file the complaint and send us the extra copy marked filed.

Very truly yours,

LYONS, PIPES AND COOK


Gordon B. Kahn

GBK:mb



FIRST NATIONAL BANK
OF BAY MINETTE

BAY MINETTE, ALA.

9-15-61

61-596
651

No. 327

Pay to *Dear Rubber Company*
THE ORDER OF

One Hundred Twenty Three & 32/100

32
\$123

DOLLARS

FOR *acc to det*

MACON DRUG STORE
Robertsdale, Ala.



William O. Mac

\$1.00 CHARGED TO DRAWER OF CHECK
RETURNED ACCOUNT OF INSUFFICIENT FUNDS

LEVY PARKER

P.O. BOX 1165

BIRMINGHAM, ALABAMA

SEP 26 1961
CANCELED

61-10-19

23 PAY TO ORDER OF

61-10-19

61-10-19

ANY BANK

THE BANK CLEARING HOUSE

SEP 10 2006

SEP 10 2006

PRIOR ENDORSEMENTS GUARANTEED

BIRMINGHAM BRANCH

FEDERAL RESERVE BANK

OF ATLANTA

61-10-19

61-574

620

SEP 22 1961

