

FOREST A. CHRISTIAN
ATTORNEY AT LAW
P.O. DRAWER 190
AREA CODE 205 -- PHONE WH 3-2201
FOLEY, ALABAMA 36535

April 10, 1964


Honorable H. M. Hall
Circuit Court
Bay Minette, Alabama

Re: Royster Fertilizer Company
Vs: Jack Hayes
\$305.50

Dear Judge Hall:

Kindly render judgment in the case mentioned above
for \$305.50.

Cordially yours,


FOREST A. CHRISTIAN

5967

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon JACK HAYES, 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 F. S. ROYSTER Guano Company, a Virginia corporation.

Witness my hand this the 9 day of March, 1964.

Alice I. Duck
Clerk

* * * * *

COMPLAINT

F. S. ROYSTER Guano
Company, a Virginia
corporation,

PLAINTIFF,

VS:

JACK HAYES,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

5967

COUNT I:

The Plaintiff claims of the Defendant TWO HUNDRED EIGHTY-ONE & 15/100 DOLLARS (\$281.15), due from him by account on, to wit: 9th day of January, 1963, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant TWO HUNDRED EIGHTY-ONE & 15/100 DOLLARS (\$281.15), due from him on account stated between the Plaintiff and the Defendant on, to wit: 9th day of January, 1963, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant TWO HUNDRED EIGHTY-ONE & 15/100 DOLLARS (\$281.15), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: 9th day of January, 1963, 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 4th day of March, 1964.

Defendant's Address:
Jack Hayes
Orange Beach, Alabama

Wm. L. L. L.
Attorney for Plaintiff

64-3-12-64
FILED

MAR 9 1964

Alice I. Duck, CLERK
REGISTER

MARCH 4 1964

MR. JACK HAYES

ORANGE BEACH, ALABAMA

In Account With **F. S. Royster** GUANO COMPANY

December 11 1962	Inv. 5912	4.83 tons Lime @8.50	41.06
December 15 1962	Inv. 5917	6.61 tons 4-12-12 @4.65	295.14
			336.20
		Less: Check 12/11/62	55.05
			281.15
		Plus: Check returned by bank, insf. 1/9/63	55.05
			336.20
		Less: Check to cover insufficient item 1/18/63	55.05
			281.15

STATE OF ALABAMA

MONTGOMERY COUNTY

BEFORE ME, [Signature] a Notary Public in and for said County, in said State, personally appeared O. Evans Vaughn, known to me, who being by me first duly sworn, on oath deposes and says: that he is the Manager of the Montgomery Office of F. S. Royster Guano Company and as such has knowledge of the correctness of the foregoing account; that said statement of account is a true, accurate and complete statement of the account of the said JACK HAYES of Orange Beach Ala., to F. S. Royster Guano Company; and, that said account is now past due and unpaid.

O. Evans Vaughn
Manager

SWORN to and subscribed before me this 4th day of March 1964.

[Signature]
Notary Public
Montgomery, County, Alabama

My Commission expires August 7, 1965

5967

SUMMONS

F. S. ROYSTER Guano Company, a
Virginia Corporation,

PLAINTIFF,

VS:

JACK HAYES,

DEFENDANT.

Served on 9 day of Mar 1914
at 12 day of Mar 1914
Served a copy of the within Doc
Jack Hayes

By service on

TAYLOR WILKINS, Sheriff

Taylor Wilkins
Jack Hayes

Sheriff claims 120 miles at
Ten Cents per mile Total \$ 12.00
TAYLOR WILKINS, Sheriff
BY [Signature] DEPUTY SHERIFF

FILED

MAR 10 1914

ALICE J. DUCK, CLERK
RECEIVED

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA