

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons J. W. KINSEY, JR. 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 FARMERS & MERCHANTS BANK, of Foley, Alabama, a corporation.

Witness my hand this the 24 day of August, 1965.

Alice L. Hurd
Clerk

CC

COMPLAINT

FARMERS & MERCHANTS BANK, of	X	
Foley, Alabama, a corporation,	X	
PLAINTIFF,	X	IN THE CIRCUIT COURT OF
VS:	X	BALDWIN COUNTY, ALABAMA
J. W. KINSEY, JR.,	X	AT LAW
DEFENDANT.	X	

COUNT I:

The Plaintiff claims of the Defendant FIVE HUNDRED THIRTY-SIX & 72/100 DOLLARS (\$536.72), due by promissory note made by him on the 17th day of June, 1964, and payable on the 15th day of December, 1964, with interest thereon.

COUNT II:

The Plaintiff claims of the Defendant the following described chattel personal property, to wit:

Five (5) mixed grade milk cows and all increase; One (1) Heafer; Three (3) mixed grade calves,

with the value of the use thereof from, to wit, December 15, 1964.

Said note provides for a reasonable attorney's fee, which the Plaintiff alleges to be ONE HUNDRED TWENTY & 00/100 DOLLARS (\$120.00).

Forest A. Christian
Forest A. Christian, Foley, Alabama
Attorney for the Plaintiff

Defendant's address:

J. W. Kinsey, Jr.
Route 1, Box 46
Foley, Alabama

EX-8-28-65

7-1-65
20 26 1965
JUL 1 1965
CLERK
BALDWIN COUNTY

70,6654 Foley

SUMMONS AND COMPLAINT

FARMERS & MERCHANTS BANK, Foley,
Alabama, a corporation,

PLAINTIFF,

VS:

J. W. KINSEY, JR.,

DEFENDANT.

Received 24 day of Aug 1965
and on 28 day of Aug 1965
I served a copy of the within O & C
on J. W. Kinsey, Jr.
By service on J. W. Kinsey, Jr.

TAYLOR WILKINS, Sheriff
J. M. Eastman D. S.
Foley, Ala.

Sheriff claims 72
Ten Cents per rule Total 7.20
TAYLOR WILKINS, Sheriff
BY J. M. Eastman
DEPUTY SHERIFF

AUG 24 1965
AUG 3 1965
CLERK
REGISTER

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

October 26, 1965

Hon. Telfair Mashburn
Circuit Judge
Bay Minette, Alabama

Re: Farmers & Merchants Bank ✓
Vs: J. W. Kinsey, Jr.
Case No. 6654 23.20

Re: Mid-South Chemical Co.
Vs: Norman Currier
Garnishee-Barber Pure
Milk Company Case No. 6139½ 5100

Dear Judge:

These two cases have been settled between the parties
and Court costs paid. Kindly enter on docket sheets.

Cordially yours,


FOREST A. CHRISTIAN

P. S. Mrs. Duck- Enclosed is check. Please send receipts soon.