

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

February 8, 1968

Hon. Telfair Mashburn
Circuit Court Judge
Bay Minette, Alabama 36507

Re: Montgomery Seed & Supply
Company, Inc.
Vs: Glen A. Stewart
Case No. 7905

Dear Judge Mashburn:

Kindly render a judgment in the above case for \$270.00
principal and \$18.00 interest, for a total of \$288.00, which
is based on/~~an~~ itemized statement of account.
sworn to

Cordially yours,



FOREST A. CHRISTIAN

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons GLEN A. STEWART, 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 MONTGOMERY SEED & SUPPLY CO., INC.

Witness my hand this the 14 day of December, 1967.

Alice J. Duck
Clerk

** ** *

COMPLAINT

MONTGOMERY SEED & SUPPLY CO.,	X	
INC.,	X	IN THE CIRCUIT COURT OF
	X	
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
	X	
VS:	X	AT LAW
	X	
GLEN A. STEWART,	X	CASE NO. <u>7915</u>
	X	
DEFENDANT.	X	

COUNT I:

The Plaintiff claims of the Defendant TWO HUNDRED SEVENTY & 00/100 DOLLARS (\$270.00), due from him by account on, to wit: the 3rd day of October, 1966, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant TWO HUNDRED SEVENTY & 00/100 DOLLARS (\$270.00) due from him on account stated between the Plaintiff and the Defendant on, to wit: the 3rd day of October, 1966, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant TWO HUNDRED SEVENTY & 00/100 DOLLARS (\$270.00), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 3rd day of October, 1966, 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 9th day of December, 1967.

ATTORNEY FOR THE PLAINTIFF

Forest A. Christian
Forest A. Christian

Defendant's address is:
Route 2
Foley, Alabama 36535

FILED

DEC 14 1967

717

ALICE J. DUCK CLERK
REGISTER

INVOICE

MONTGOMERY SEED & SUPPLY COMPANY, INC.

243 DEXTER AVE.

WHOLESALE

PHONE 265-8241

P. O. BOX 867

MONTGOMERY, ALA. 36102

9-9-66

INVOICE

846

Sold To Glenn Stewart
Route 2
Foley, Alabama

Terms: **NET CASH**
30 DAYS

It is understood and agreed that the seller does not give, and its agents and employees are forbidden to give, any warranty, express or implied, as to the description, quality, productiveness, condition, fitness or suitability or any other matter except that such goods shall be as labeled, of any seeds or bulbs delivered or to be delivered by it, and that in all cases it is not, and will not be, in any way responsible for the crop. The seller's liability, in all instances, is expressly limited to the purchase price of the seeds or bulbs. If such goods are not accepted on these terms, they are to be returned within five days of purchase.

500 lbs. Dixie Cert. R. S. Clover	31.00 hd.	155.00
Lot# M11-6-B49CCD		
30 bu. Wrens Carolina Rye Lot# 3197	3.75 bu.	112.50
5 pkgs. B 100 lbs. Nitragin	.50	2.50
		<u>270.00</u>

I hereby certify that this is a true, correct, and unpaid bill.
Montgomery Seed & Supply Co., Inc.

By John W. Morgan Vice Pres.

Sworn to and subscribed before me this 9th. day of December, 1967.

William B. Ramsey
Notary Public

EXCEPT where Sales Tax, if due, has been added, the above merchandise has been SOLD FOR RESALE and purchaser agrees that Sales Tax, if due, is due and payable on subsequent sales. All accounts over 90 days old will be charged with interest at 1% per month.

Served 14 day of Dec. 1967
and on 3 day of Jan. 68
I served a copy of the writ
on Glenn Stewart

By service on Glenn Stewart
TAYLOR WILKINS, Sheriff
BY M. Eastman

Sheriff claims 72 miles at
Ten Cent per mile Total \$ 7.
BY M. Eastman
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

MONTGOMERY SEED & SUPPLY CO., INC.,

PLAINTIFF,

VS:

GLEN A. STEWART,

DEFENDANT.

FILED

DEC 14 1967

ALICE J. BERRY
CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
(205) 943-2201
P. O. DRAWER 190
FOLEY, ALABAMA 36535

GATLIN LUMBER COMPANY, INC.,)
Plaintiff,)
vs.)
GLEN STEWART, also known as)
DONALD G. STEWART,)
Defendant,)
FARMERS & MERCHANTS BANK of)
Foley, Alabama,)
Garnishee.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

CASE NO. 7642½

ANSWER

Comes the FARMERS & MERCHANTS BANK, Foley, Alabama, the
Garnishee in the above styled cause, and for answer to the writ
of garnishments says:

That on the date that the writ of garnishment was served
on the Garnishee, GLEN STEWART had the sum of One Thousand,
Seventy-three and 05/100 Dollars (\$1,073.05) on deposit with the
Garnishee. That this sum constitutes and represents the entire
deposit that the said GLEN STEWART had with the Garnishee.

That the above sum has been remitted to the Court with the
Answer to the Writ of Garnishment in Case No. 7905½ in which
MONTGOMERY SEED AND SUPPLY COMPANY, INC., was the Plaintiff and
GLEN STEWART, also known as Donald G. Stewart, was the Defendant;
that the balance of the proceeds are to be applied to the
Judgment in this cause.

FARMERS & MERCHANTS BANK

By

Anthony Sute
Jay W. Rice
Anthony Sute

Vice President

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, for this State and
County, personally appeared *Anthony Sute*, Vice Pres. of the FARMERS &
MERCHANTS BANK, Foley, Alabama, who first being duly sworn, de-
poses and says on oath; that he has read the foregoing; the he
has knowledge of the averments therein and that the same are true
and correct.

Anthony Sute
Jay W. Rice
Vice President

Sworn to and subscribed before me
on this the 18th day of November,
1972.

Thomas W. Underwood
Notary Public, Baldwin County
State of Alabama

FILED

NOV 20 1972

EUNICE B. BLACKMON CIRCUIT
CLERK