

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

April 9, 1969

Honorable Telfair Mashburn  
Judge of Circuit Court  
Bay Minette, Alabama 36507

Re: Farm Service Center  
Vs: J. W. Minchew  
Case No. 8275

Dear Judge Mashburn:

Kindly render a judgment in this case based  
on answer to itemized statement of account on  
which there is a principal balance due of \$164.75,  
plus \$5.25 interest, for a total of \$170.00.

Cordially yours,



FOREST A. CHRISTIAN

COPY

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 -- PHONE 943-2201

RES. 943-7102

FOLEY, ALABAMA 36535

September 5, 1969

Standard Furniture Company  
Bay Minette, Alabama 36507

Re: Farm Service Center  
Vs: J. W. Minchew  
Case No. 8275

Gentlemen:

We realize that J. W. Minchew was injured in an automobile accident. However, we did file a garnishment in the above case in May.

Please account to the Clerk of Court, Mrs. Alice J. Duck, Bay Minette, Alabama for any monies collected and also inform us whether or not Mr. Minchew is receiving any monies from you.

We know that he was injured so that he was on the verge of death, that most of his stomach was lost, and that his legs and arms are in bad shape.

Cordially yours,



FOREST A. CHRISTIAN

FARM SERVICE CENTER,           X  
                                  X   IN THE CIRCUIT COURT OF  
PLAINTIFF,                   X  
VS:                           X   BALDWIN COUNTY, ALABAMA  
J. N. MINCHEW,               X                   AT LAW  
                                  X                   CASE NO. 8275  
DEFENDANT.                   X

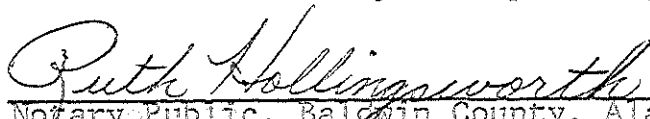
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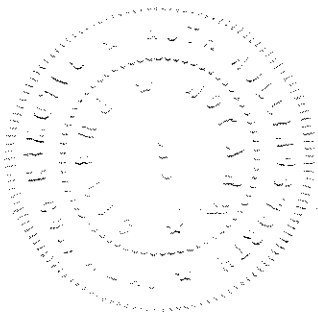
STATE OF ALABAMA,   )  
BALDWIN COUNTY.     )

FOREST A. CHRISTIAN, first being duly sworn, deposes and says as follows: My name is FOREST A. CHRISTIAN and I am the attorney for the Plaintiff in the above styled case which was filed in the Circuit Court of Baldwin County, Alabama, on August 22, 1968, against J. N. MINCHEW and he was served on September 7, 1968. It has come to our attention that this debt is owed by his son, J. W. MINCHEW, who should be served at the address shown in the original complaint, a copy of said Summons and Complaint is attached for service on J. W. Minchew.

  
Forest A. Christian

Sworn to and subscribed before me  
on this the 25th day of September, 1968.

  
Notary Public, Baldwin County, Alabama



SUMMONS

STATE OF ALABAMA, )

COUNTY OF BALDWIN. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons J. N. MINCHEW, 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 FARM SERVICE CENTER.

Witness my hand this the 22 day of August, 1968.

Alice J. Duck  
Clerk

\*\* \*\* \*

COMPLAINT

FARM SERVICE CENTER,

PLAINTIFF,

VS:

J. N. MINCHEW,

DEFENDANT.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

720.8275

COUNT I:

The Plaintiff claims of the Defendant ONE HUNDRED SIXTY-FOUR & 75/100 DOLLARS (\$164.75), due from him by account on, to wit: the 2nd day of April, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant ONE HUNDRED SIXTY-FOUR & 75/100 DOLLARS (\$164.75), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 2nd day of April, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant ONE HUNDRED SIXTY-FOUR & 75/100 DOLLARS (\$164.75), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 2nd day of April, 1968, 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 21st day of August, 1968.

James C. Cline  
Attorney for the Plaintiff

Defendant's address is:

Mr. J. N. Minchew  
c/o W. C. Davis  
Magnolia Springs, Alabama

FILED

AUG 22 1968

ALICE J. DUCK CLERK  
REGISTER

AFFIDAVIT

STATE OF ALABAMA )

COUNTY OF BALDWIN )

Before me, the undersigned authority in and for aforesaid County and State, who is a Notary Public under my seal of office, which seal of office is hereto attached, personally appeared COLE D. BROWN known ~~to me~~ being duly sworn upon his oath ~~that~~ he is the President of FARM SERVICE CENTER <sup>Company</sup> organized and doing business under the laws of the State of Alabama, that as such he makes this affidavit, that he is familiar with the books and business of FARM SERVICE CENTER, that the attached account against J. N. MINCHEW is just and correct, within the knowledge of the affidavit, that he has authority to make this affidavit and that he has personal knowledge of the ~~entire~~ contents contained herein, that the items thereon stated composing the said account, were sold and delivered to the above mentioned debtor at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which said debtor is entitled as thereon stated, and that the balance thereof, amounting to the sum of \$164.75 with interest from April 2, 1968, is justly due and remains unpaid.

Cole D. Brown

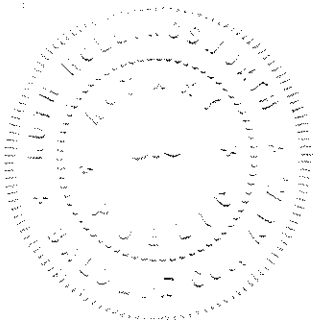
Affiant, Cole D. Brown, President of  
Farm Service Center

Sworn to, subscribed, acknowledged, signed and sealed before me as a Notary Public under my seal of office, with my seal hereto affixed on this the 21st day of August, 1968.

Affix Seal:

Ruth Hollingsworth  
Notary Public

My Commission Expires: Mar. 2, 1970



24: 9-7-68

MAGNOLIA SPRING  
SUMMONS & COMPLAINT

Received 22 day of Aug 1968  
and on 7 day of Sept 1968  
served a copy of the within J. N. Minchew  
by service on J. N. Minchew

TAYLOR WILKINS, Sheriff  
By M. Eastburn D. S.  
Moulton Ala-

80  
COUNTY CLERK  
J. N. Minchew  
Eastburn

Received 26 day of Sept 1968  
and on 7 day of Sept 1968  
served a copy of the within J. N. Minchew  
on J. N. Minchew  
by service on J. N. Minchew  
TAYLOR WILKINS, Sheriff  
By Barry M. Smith D. S.

FARM SERVICE CENTER,  
PLAINTIFF,  
VS:  
J. N. MINCHEW,  
965-2133  
DEFENDANT.

FILED  
AUG 23 1968  
ALICE J. BRYAN  
CLERK  
REGISTER

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

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA 36535

# FARM SERVICE CENTER, INC.

P.O. BOX 699

FOLEY, ALABAMA 36535

PHONE  
943-6162

No 239

TO

*J. N. Murchew*  
*% W. C. Lewis*  
*Magnolia Springs*

DATE

*4-2*, 196*8*

CREDIT CARD NO.

SALESMAN

*Liquid Fertilizer + application*

*\$ 164 75*

*Please make payment.*

TOTAL

*164 75*