

S U M M O N S

STATE OF ALABAMA,)

COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons J. A. CLEMMONS, 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, INC.

Witness my hand this the 24 day of October, 1968.

Alice J. Duck
Clerk

** ** *

COMPLAINT

FARM SERVICE CENTER, INC.,	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:	X	AT LAW
J. A. CLEMMONS,	X	8396
DEFENDANT.	X	

COUNT I:

The Plaintiff claims of the Defendant SEVEN HUNDRED TWENTY-SIX & 96/100 DOLLARS (\$726.96), due from him by account on, to wit: the 31st day of July, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant SEVEN HUNDRED TWENTY-SIX & 96/100 DOLLARS (\$726.96), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 31st day of July, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant SEVEN HUNDRED TWENTY-SIX & 96/100 DOLLARS (\$726.96), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 31st day of July, 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.

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

Defendant's address:

P. O. Box 174
Foley, Alabama

Northwest Foley

FILED

OCT 24 1968

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, who being duly sworn upon his oath swears that he is the President of FARM SERVICE CENTER ^{officer} _{Company}, 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. A. CLEMMONS 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 matters 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 \$726.96 with interest from 31st July, 1968, is justly due and remains unpaid.

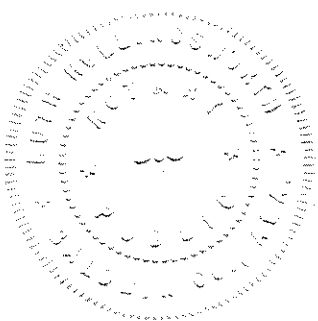
Cole D. Brown
Affiant Cole D. Brown, President
of FARM SERVICE CENTER.

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



Five Men in Bay Minette, Ala.
On a truck for Oranville, Ala.

Received 20th day of Feb. 1969
and on 20 day of Feb. 1969
I served a copy of the within on J. A. Clemmons

By service on _____

TAYLOR WILKINS, Sheriff
By W. C. Taylor D. S.

Returned 18 day of November 1968
Not found in my county after diligent search and

Taylor, Wilkins, Sheriff
W. C. Taylor Deputy Sheriff

Returned 18 day of Nov 1968
Not found in my county after diligent search and

Taylor, Wilkins, Sheriff
W. C. Taylor Deputy Sheriff

Ret: Not Found
11/14/68

SUMMONS AND COMPLAINT

FARM SERVICE CENTER, INC.,

PLAINTIFF,

VS:

J. A. CLEMMONS,

Bay Minette, Ala.
DEFENDANT.

Sheriff claims 0 miles

Ten Cents per mile Total \$
TAYLOR WILKINS, Sheriff

DEPUTY SHERIFF

FILED
OCT 24 1968

CLERK
REGISTER

Wks. for Paper Co.
Truck Driver
LAW OFFICE OF

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

303

8396



ALLIED CHEMICAL CORPORATION

P.O. Box 36090M Pittsburgh, Penn., 15230

STATEMENT
OF ACCOUNT

To J A CLEMMONS
P O BOX 174
FOLEY ALA

CUSTOMER NO.

1439 342 8

STATEMENT DATE

07 31 68

TERMS: NET 20 DAYS FROM STATEMENT DATE.
½ OF 1% PER MONTH CARRYING CHARGES
ON PAST DUE BALANCES.

AGENT

NAME	NO.
FARM SERVICE CENTER INC	2748 1

IMPORTANT

PLEASE DETACH THIS PORTION AND
RETURN WITH YOUR PAYMENT, PAY-
ABLE TO: ALLIED CHEMICAL COR-
PORATION.

⑆501100000⑆ 1423005⑈

PREVIOUS BALANCE ▶						TOTALS
675.99 47.59						723.58
DATE	REF	NUMBER	DEBITS	CARRYING CHARGES	CREDITS	
07/31/68	CHG			3.38		
CURRENT ACTIVITY ▶						3.38
Payments, Credits, and Purchases reaching our office after statement date will be shown on your next statement.						726.96 ✓

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 — PHONE 943-2201

FOLEY, ALABAMA 36535

March 31, 1969

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

Re: Farm Service Center
Vs: J. A. Clemmons
Case No. 8396

Dear Judge Mashburn:

Kindly render a judgment in this case based on answorn and itemized statement of account on which there is a principal balance due of \$726.96, plus \$9.04 interest, for a total of \$736.00.

Cordially yours,



FOREST A. CHRISTIAN