

JAMES V. GRIMES d/b/a)	
LOXLEY PRODUCE COMPANY,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA
FRED JOHNSON,)	AT LAW
Defendant.)	CASE NO. <u>8720</u>
)	

COUNT I

The Plaintiff claims of the Defendant SEVEN HUNDRED EIGHTY FIVE AND 64/100 (\$785.64) DOLLARS due from the Defendant on account stated on the 18th day of April, 1969, which sum of money together with interest thereon is still due and unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED EIGHTY FIVE AND 64/100 (\$785.64) DOLLARS due from the Defendant by account, on to-wit: April 18, 1969, which sum of money with interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is attached hereto as Exhibit "A", and made a part hereof.

WILTERS & BRANTLEY

BY: *William M. Brantley*
Attorneys for Plaintiff

FILED
JUN 25 1969
ALICE J. DUCK CLERK
REGISTER

LOXLEY PRODUCE COMPANY

JAMES V. GRIMES

REFERENCES:

Farmers and Merchants Bank
Foley, Alabama

Produce Reporter

The Packer

GROWERS AND DEALERS IN FARM PRODUCTS

TELEPHONES:

Long Distance 964-3522 (SS)

Local 964-3532

Area Code 205

IRISH POTATOES AND SOYBEANS

LOXLEY, ALABAMA 36551

Statement
April 18, 1969

DEBIT:

Mar. 15, 1966	8 tons 8-8-8-Prem. @\$42.50 ton	\$340.00
Mar. 16, 1966	1½ tons 8-8-8	\$ 64.50
Mar. 28, 1966	1 ton 4-12-12 @ \$40.00 ton	\$40.00
May 7, 1966	10 bu. Hood @ \$4.50 bu.	\$45.00
May 9, 1966	2 tons 4-12-12 wSlag @\$34.00 ton	\$68.00
May 16, 1966	10 gal. VineKiller @\$2.15	\$21.50
July 20, 1966	14 bu. Bragg @\$4.65	\$65.10
Jan. 24, 1967	50 Sx LaSoda Potato seed@4.75 Sx	
	50 Sx White Superior @\$5.50	
	180 Sx8-8-8@45.75 per ton	\$924.25
Mar. 15, 1967	60 Sx 8-8-8 \$45.00 per ton	\$135.00
Mar. 28, 1967	50 lbs.Dithane M-45 @.78 per lb.	
	20 Sx 8-8-8 @\$45.00 per ton	\$84.00
April 28, 1967	3 100# 4-12-12 Fert.	\$ 6.75
June 16, 1967	33/4 tons 4-12-12 wSlag @\$34.00 tom	\$254.90
	Total	\$2,049.00

Credit:

Oct. 24, 1966	Bean Settlement	\$149.82
Nov. 22, 1966	Bean Settlement	\$200.00
May 19, 1966	Cash	\$350.00
June 10, 1967	a/c	\$120.00
June 14, 1967	a/c	\$ 80.00
Dec. 15, 1967	Bean Settlement	\$363.54
	Total	\$1,263.36

Total amount due: \$785.64

Statement of Fred Johnson
Daphne, Alabama

STATE OF ALABAMA
BALDWIN COUNTY

Before me, Sallene M Brandy a Notary Public, in and for said County and State, personally appeared James V. Grimes, d/b/a Loxley Produce Company, who, being by me first duly sworn, deposes and says: That he is the owner of Loxley Produce Company; that the annexed statement of account of Loxley Produce Company against Fred Johnson of Daphne, in the State of Alabama, is just, true and correct; and that there is now due on said account the sum of SEVEN HUNDRED EIGHTY FIVE AND 64/100 (\$785.64) DOLLARS after deducting all credits, set-offs and counter-claims.

James V. Grimes
James V. Grimes

June Sworn to and subscribed before me this 29 day of _____, 1969.

Sallene M Brandy
Notary Public

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Fred Johnson

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, State of Alabama, at Bay Minette, against.....

Fred Johnson Defendant.....

by

James V. Grimes d/b/a Loxley Produce Company Plaintiff.....

Witness my hand this 25 day of June 1969

Alice J. J. J., Clerk

ef
73-69

No. 8770

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

James V. Grimes d/h/a Loxley

Produce Company

Plaintiffs

vs.

Fred Johnson

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

JUN 25 1969

Clerk

ALICE J. DUCK

CLERK
REGISTER

Wilters & Brantley

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Daphne, Alabama

Received in Office

RECEIVED
July 3, 1969
301-45-269

19.....

Sheriff

I have executed this summons

this July 9, 1969

by leaving a copy with

Fred Johnson

(Need better
address)

Returned 30 day of June 1969

Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff

By Randall

Deputy Sheriff

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

By Randall
DEPUTY SHERIFF

Taylor Wilkins, Sheriff

R. Randall, Deputy Sheriff

Daphne