

JAMES V. GRIMES d/b/a  
LOXLEY PRODUCE COMPANY,

Plaintiff,

VS.

EDNA WHATLEY, as Administratrix  
of the Estate of Otis Irwin,  
deceased,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8772

COUNT I

The Plaintiff claims of the Defendant EIGHT HUNDRED TWENTY FIVE AND 10/100 (\$825.10) DOLLARS due from Otis Irwin for merchandise, goods and chattel sold by the Plaintiff to Otis Irwin during the period from June 5, 1968, through November 22, 1968, which sum of money with interest thereon is still unpaid. Your Plaintiff avers that, since the time of the making of this debt, Otis Irwin has died intestate and that Edna Whatley has been duly appointed Administratrix of his estate; that the same is now pending in the Circuit Court of Baldwin County, Alabama.

WILTERS & BRANTLEY

BY: *William M. Brantley*

Attorneys for Plaintiff

FILED

JUN 25 1969

ALICE J. DECK

CLERK  
REGISTER

STATE OF ALABAMA

BALDWIN COUNTY

The undersigned James V. Grimes, being first duly sworn on oath, states that he is the owner of Loxley Produce Company, the owner of the claim against the Estate of Otis Irwin, deceased, hereto attached and made a part hereof; that the same and every item thereof is lawful and justly due; that the consideration therefor is for goods and merchandise sold and delivered as per statement attached; that there is now due and unpaid on said claim the sum of EIGHT HUNDRED TWENTY FIVE AND 10/100 (\$825.10) DOLLARS with interest thereon at the rate of six per cent (6%) per annum from the 5th day of June, 1968; that there are no payments on said claim in the way of discounts or otherwise; that there are no set-offs nor counterclaims whatever against the same; that there is no usury therein; that said owner has no collateral, personal, or other security whatever for the same.

Sworn to and subscribed before me this the 24 day  
of June, 1969.

Lillian M Brandy  
Notary Public

FILED

JUN 25 1969

ALICE J. DICK 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:

June 5, 1968	18 bu. Hampton @ \$4.45 bu.	\$80.10
June 7, 1968	10 bu. Dare @\$5.00 bu.	\$50.00
June 14, 1968	30 bu. Bragg @\$4.30 bu.	\$129.00
June 15, 1968	20 bu. Bragg @\$4.30	\$86.00
June 24, 1968	27 bu. Bragg @\$4.30	\$116.10
June 25, 1968	20 bu. Hampton@\$4.60 bu.	\$92.00
June 23, 1968	20 bu. Bragg@\$4.20 bu.	\$86.00
July 9, 1968	20 bu. Hampton@ \$4.45	\$89.00
July 13, 1968	20 bu. Bragg @\$4.30	\$86.00
Aug. 20, 1968	6 tons 6-12-12(Spread with truck)@ \$51.00 ton.	\$306.00
Nov. 19, 1968	Advance	\$359.70
Nov. 22, 1968	Advance	\$100.00
	Total:	<u>\$1,579.90</u>

### Credit:

Aug. 15, 1968	Check	\$295.10
Dec. 3, 1968	Soybean Settlement	\$459.70
	Total:	<u>\$754.80</u>

Total amount due: \$825.10

Statement of Otis Irwin  
Robertsdale, Alabama

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 ..... Edna Whatley, as Administratrix of the  
Estate of Otis Irwin, deceased .....

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 Edna Whatley  
as Administratrix of the Estate of Otis Irwin, deceased, Defendant.....

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

Witness my hand this 25 day of June 19 69.  
Clifford D. Duck ....., Clerk

416-26-69

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

James V. Grimes, d/b/a Loxley

Produce Company

Plaintiffs

vs.

Edna Whatley, as Administratrix  
of the Estate of Otis Irwin, deceased  
Defendants

SUMMONS AND COMPLAINT

**FILED**

Filed ..... 19.....

JUN 25 1969

Clerk

**ALICE J. BUCK**

CLERK  
REGISTER

Wilters & Brantley

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robertsdale, Alabama

**RECEIVED**  
Received in Office

JUN 25 1969

19.....

**WILKINS**

Sheriff

I have executed this summons

this 26 June 1969

by leaving a copy with

Edna Whatley,  
As Adm. of the  
Estate of Otis Irwin,  
deceased

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY Brown  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

H. J. Brown Deputy Sheriff

R. Dale  
50 miles R T