

S U M M O N S

STATE OF ALABAMA)
COUNTY OF BALDWIN)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

TO ANY SHERIFF OF THE STATE OF ALABAMA-----GREETINGS:

You are hereby commanded to summon E. C. Jordan to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County, Equity side, at the place of holding same, and then and there to answer the Bill of Complaint filed against him by S. V. Bacon.

Witness my hand this 15 day of Oct, 1959.

W. J. ...
As Register of the Circuit Court of
Baldwin County, Alabama, in Equity.

Respondent resides in Foley, Alabama.

BILL OF COMPLAINT

S. V. BACON,) IN THE CIRCUIT COURT OF
Complainant,)
VS.) BALDWIN COUNTY, ALABAMA
E. C. JORDAN,) IN EQUITY.
Respondent.)

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

S. V. Bacon presents this Bill of Complaint against E. C. Jordan and thereupon the Complainant shows unto the Court and Your Honor as follows:

1. The Complainant is over twenty-one years of age and is a resident of Etowah County, Alabama. The Respondent is over twenty-one years of age, and is a resident of Baldwin County, Alabama.

2. The Respondent, E. C. Jordan, owned or did own a twenty-six foot motor cruiser, which was on and prior to December, 1957, situated in Etowah County, Alabama. Shortly prior to December, 1957, the Respondent, E. C. Jordan, delivered the said boat to the

Complainant to be repaired by the Complainant, pursuant to the instructions given to him by the said Respondent, E. C. Jordan. The Complainant, S. V. Bacon, repaired the said boat at Gadsden, in Etowah County, Alabama, which repairs were completed on, to-wit: December 20, 1957.

3. Fifty-Six and 72/100 (\$56.72) Dollars is the reasonable value of the work done and material furnished by the Complainant in repairing the said boat.

4. On, to-wit: the 5th day of September, 1959, the Complainant filed in the office of the Judge of Probate of Baldwin County, Alabama, a statement of lien, a copy of which is hereto attached marked "Exhibit A", and by reference made a part hereof as though fully incorporated herein.

5. The Complainant claims of the Respondent, E. C. Jordan, Fifty Six and 72/100 (\$56.72) Dollars due from him for work and labor done for the Respondent by the Complainant on, to-wit: the 20th day of December, 1957, at his request, which sum of money with interest thereon is still due and unpaid.

PRAYER FOR PROCESS

Complainant prays that the usual process of this Honorable Court will forthwith issue to the Respondent requiring him to appear and plead, answer or demur to the Bill of Complaint filed against him in this cause within the time required by Law.

PRAYER FOR RELIEF

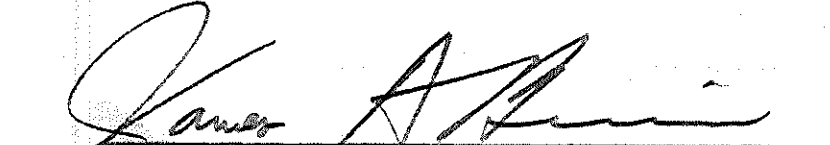
Complainant prays for the following separate and several relief:


A. That it be ORDERED, ADJUDGED AND DECREED that the Respondent, E. C. Jordan, is indebted to the Complainant in the sum of Fifty Six and 72/100 (\$56.72) Dollars, together with interest thereon from the 20th day of December, 1957, at six (6%) per cent per annum.

B. That it be ORDERED, ADJUDGED AND DECREED that the Complainant has a lien on the above described boat for the amount due

him and that the said boat be ordered sold in the manner provided by Title 33, Section 38 of the Code of Alabama, 1940, unless the amount due the complainant is paid.

C. Complainant further prays for such other, further and general relief as he may be equitably entitled to, the premises considered.



JAMES A. BRICE


RICHARD C. LACEY

SOLICITORS FOR COMPLAINANT

EXHIBIT A

STATE OF ALABAMA)
BALDWIN COUNTY)

S. V. Bacon files this statement in writing, verified by the oath of S. V. Bacon, who has personal knowledge of the facts herein set forth:

That the said S. V. Bacon claims a lien upon the following described property formerly situated in Etowah County, Alabama, to-wit:

ONE TWENTY-SIX FOOT MOTOR CRUISER

THIS LIEN is claimed on the entire boat.

The said lien is claimed to secure an indebtedness of Fifty-Six Dollars and Seventy-Two (\$56.72) Cents with interest from, to-wit; the 20th day of December 1957, for work and labor done on the said boat in Etowah County, Alabama by S. V. Bacon.

The name of the owner of the said property is GE Jordan.

S. V. Bacon
S. V. BACON

FILED
CLERK
JUL 12 1959
ETOWAH COUNTY

5314

Before me, the undersigned, a Notary Public, in and for said County of Etowah, State of Alabama, personally appeared S. V. Bacon, who being duly sworn, doth depose and say: That he has personal knowledge of the facts set forth in the foregoing statement of lien and that the same are true and correct to the best of his knowledge and belief.

S. V. Bacon
S. V. BACON

Sworn to and subscribed before me this
30th day of July, 1959.

Patricia Reed :Notary Public

S U M M O N S

STATE OF ALABAMA)
COUNTY OF BALDWIN)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

TO ANY SHERIFF OF THE STATE OF ALABAMA-----GREETINGS:

You are hereby commanded to summon E. C. Jordan to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County, Equity side, at the place of holding same, and then and there to answer the Bill of Complaint filed against him by S. V. Bacon.

Witness my hand this 16 day of Oct, 1959.

Alvin J. ...
As Register of the Circuit Court of
Baldwin County, Alabama, in Equity.

Respondent resides in Foley, Alabama.

BILL OF COMPLAINT

S. V. BACON,)
Complainant,)
VS.)
E. C. JORDAN,)
Respondent.)
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

S. V. Bacon presents this Bill of Complaint against E. C. Jordan and thereupon the Complainant shows unto the Court and Your Honor as follows:

1. The Complainant is over twenty-one years of age and is a resident of Etowah County, Alabama. The Respondent is over twenty-one years of age, and is a resident of Baldwin County, Alabama.

2. The Respondent, E. C. Jordan, owned or did own a twenty-six foot motor cruiser, which was on and prior to December, 1957, situated in Etowah County, Alabama. Shortly prior to December, 1957, the Respondent, E. C. Jordan, delivered the said boat to the

Complainant to be repaired by the Complainant, pursuant to the instructions given to him by the said Respondent, E. C. Jordan. The Complainant, S. V. Bacon, repaired the said boat at Gadsden, in Etowah County, Alabama, which repairs were completed on, to-wit: December 20, 1957.

3. Fifty-Six and 72/100 (\$56.72) Dollars is the reasonable value of the work done and material furnished by the Complainant in repairing the said boat.

4. On, to-wit: the 5th day of ~~September~~, 1959, the Complainant filed in the office of the Judge of Probate of Baldwin County, Alabama, a statement of lien, a copy of which is hereto attached marked "Exhibit A", and by reference made a part hereof as though fully incorporated herein.

5. The Complainant claims of the Respondent, E. C. Jordan, Fifty Six and 72/100 (\$56.72) Dollars due from him for work and labor done for the Respondent by the Complainant on, to-wit: the 20th day of December, 1957, at his request, which sum of money with interest thereon is still due and unpaid.

PRAYER FOR PROCESS

Complainant prays that the usual process of this Honorable Court will forthwith issue to the Respondent requiring him to appear and plead, answer or demur to the Bill of Complaint filed against him in this cause within the time required by Law.

PRAYER FOR RELIEF

Complainant prays for the following separate and several relief:

A. That it be ORDERED, ADJUDGED AND DECREED that the Respondent, E. C. Jordan, is indebted to the Complainant in the sum of Fifty Six and 72/100 (\$56.72) Dollars, together with interest thereon from the 20th day of December, 1957, at six (6%) per cent per annum.

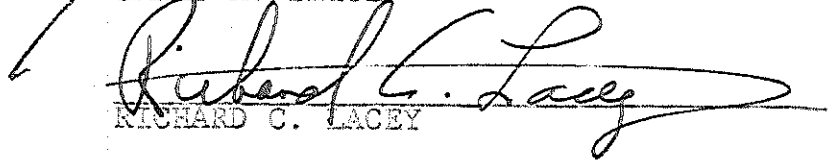
B. That it be ORDERED, ADJUDGED AND DECREED that the Complainant has a lien on the above described boat for the amount due

him and that the said boat be ordered sold in the manner provided by Title 33, Section 38 of the Code of Alabama, 1940, unless the amount due the complainant is paid.

C. Complainant further prays for such other, further and general relief as he may be equitably entitled to, the premises considered.



JAMES A. BRICE



RICHARD C. LACEY

SOLICITORS FOR COMPLAINANT

STATE OF ALABAMA, BALDWIN COUNTY

Filed 9-5-59 8 A M
Recorded Exp Lien book 5 page 346

[Signature]
Judge of Probate [Signature]

EXHIBIT A

STATE OF ALABAMA)
(
BALDWIN COUNTY)

S. V. Bacon files this statement in writing, verified by the oath of S. V. Bacon, who has personal knowledge of the facts herein set forth:

That the said S. V. Bacon claims a lien upon the following described property formerly situated in Etowah County, Alabama, to-wit:

ONE TWENTY-SIX FOOT MOTOR CRUISER

THIS LIEN is claimed on the entire boat.

The said lien is claimed to secure an indebtedness of Fifty-Six Dollars and Seventy-Two (\$56.72) Cents with interest from, to-wit; the 20th day of December 1957, for work and labor done on the said boat in Etowah County, Alabama by S. V. Bacon.

The name of the owner of the said property is C. E Jordan.

[Signature: S. V. Bacon]
S. V. BACON

STATE OF ALABAMA ()
ETOWAH COUNTY ()

Before me, the undersigned, a Notary Public, in and for said County of Etowah, State of Alabama, personally appeared S. V. Bacon, who being duly sworn, doth depose and say: That he has personal knowledge of the facts set forth in the foregoing statement of lien and that the same are true and correct to the best of his knowledge and belief.

[Signature: S. V. Bacon]
S. V. BACON

Sworn to and subscribed before me this 30th day of July 1959.

[Signature: Patricia M...] :Notary Public

Lien
OCT 16 1959
CLERK
DEPT. OF REVENUE
REGISTER

S. V. BACON,)	IN THE CIRCUIT COURT OF
COMPLAINANT,)	BALDWIN COUNTY, ALABAMA
VS.)	IN EQUITY
E. C. JORDAN,)	
RESPONDENT.)	

D E C R E E

Proof by affidavit of complainant touching the lien claimed and the amount of the indebtedness having been had, the Court finds that the complainant is entitled to the sum of Sixty Five and 23/100 (\$65.23) Dollars, and to a lien upon the property of the respondent, to-wit: One (1) 26-foot motor cruiser, now docked at Orange Beach, Alabama, for said amount. It is therefore,

ORDERED, ADJUDGED, AND DECREED that the complainant have and recover of the respondent the sum of Sixty Five and 23/100 (\$65.23) Dollars, together with the costs of this cause, and that ~~a lien upon the said property be and the same is hereby established~~ and declared in favor of the complainant for said amount, and the said property is hereby condemned and ordered sold for the satisfaction of this decree.

DONE this ____ day of _____, 1960.

H. M. HALL, JUDGE
28TH JUDICIAL DISTRICT
OF ALABAMA

S. V. BACON,)	IN THE CIRCUIT COURT OF
COMPLAINANT,)	BALDWIN COUNTY, ALABAMA
VS.)	IN EQUITY
E. C. JORDAN,)	
RESPONDENT.)	

D E C R E E

Proof by affidavit of complainant touching the lien claimed and the amount of the indebtedness having been had, the Court finds that the complainant is entitled to the sum of Sixty Five and 23/100 (\$65.23) Dollars, and to a lien upon the property of the respondent, to-wit: One (1) 26-foot motor cruiser, now docked at Orange Beach, Alabama, for said amount. It is therefore,

ORDERED, ADJUDGED, AND DECREED that the complainant have and recover of the respondent the sum of Sixty Five and 23/100 (\$65.23) Dollars, together with the costs of this cause, and that a lien upon the said property be and the same is, hereby established and declared in favor of the complainant for said amount, and the said property is hereby condemned and ordered sold for the satisfaction of this decree.

DONE this ____ day of _____, 1960.

H. M. HALL, JUDGE
28TH JUDICIAL DISTRICT
OF ALABAMA

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

December 8, 1960

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re: S. V. Bacon
Vs: E. C. Jordan
In Equity No. 4732

Dear Mrs. Duck:

Some three months ago you told me that the final
decree which I had drafted was on Judge Hall's desk. Is
this still the case?

I am well aware that the case is yet pending but
I want to know what, if anything, may be done to give
this man some relief.

Sincerely,


James A. Brice

JAB:j

P.S.

Perhaps you should contact
the Judge.

a. j. ad.

S. V. BACON,
COMPLAINANT
VS.
E. C. JORDAN,
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY 4732

DECREE

Proof by affidavit of complainant touching the lien claimed and the amount of the indebtedness having been had, the Court finds that the complainant is entitled to the sum of Sixty Five and 23/100 (\$65.23) Dollars, and to a lien upon the property of the respondent, to-wit: One (1) 26-foot motor cruiser, now docked at Orange Beach, Alabama, for said amount. It is therefore,

ORDERED, ADJUDGED, AND DECREED that the complainant have and recover of the respondent the sum of Sixty Five and 23/100 (\$65.23) Dollars, together with the costs of this cause, and that a lien upon the said property be and the same is, hereby established and declared in favor of the complainant for said amount, and the said property is hereby condemned and ordered sold for the satisfaction of this decree.

DONE this 21 day of February 1961.

FILED
FEB 22 1961
ALICE J. DUCK CLERK
REGISTER

H. M. Hall
H. M. Hall, Judge
28th Judicial District
of Alabama