

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA: You are hereby commanded to summon HARTFORD FARMS, J. C. VAN LIEROP, owner, 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 HARTFORD FARMS, J. C. VAN LIEROP, owner, by O'Pry Brothers

Witness my hand this the 5<sup>th</sup> day of March, 1948.

Wice J. Murch  
Clerk

O'PRY BROTHERS,  
W. H. O'Pry and Garland  
O'Pry, Partners,  
Plaintiffs  
vs.

HARTFORD FARMS,  
J. C. Van Lierop, Owner  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN LAW

#### COMPLAINT

The Plaintiffs claim of the Defendant \$815.00, for work and labor done for the Defendant by the Plaintiffs on the 3rd day of January 1948, at its request, which sum of money, with interest thereon is still unpaid.

Forest A. Christian, Foley, Alabama  
Attorney for Plaintiffs

There is attached hereto and made a part hereof an itemized statement of the amount of this claim, verified by the affidavit of a competent witness. Made before and certified to by a Notary Public which shows the amount owed on this claim as of March 3, 1948.

Forest A. Christian, Foley, Alabama

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

AFFIDAVIT OF W. H. O'PRY

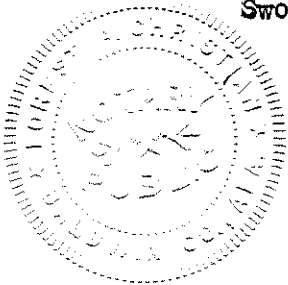
W. H. O'Pry, first being duly sworn, deposes and says as follows:

That he is one of the partners in O'Pry Brothers, the Plaintiffs in the case of O'PRY BROTHERS vs. HARTFORD FARMS; that as such partner, he knows that Hartford Farms, Foley, Alabama, requested O'Pry Brothers to truck gladiolas from Foley, to Ft. Meyers, Florida; that three trips were made to Ft. Meyers; and two trips from Foley to Loxley, Alabama; and that the reasonable charge for this hauling is \$815.00; and that there have/no been payments made on this account.

W. H. O'Pry  
Affiant

Sworn to and subscribed before me this the 3rd day of March, 1948.

James M. O'Pry  
Notary Public



this 5 day of March, 1948  
TAYLOR WILKINS, Sheriff

115

20  
Excluded By sending a  
Copy of the Writings within  
on Hartford Farms  
J. J. Verdonschot  
as agent. 3/11/48  
Taylor Wilkins Sheriff  
Zellie B. Griffin D.S.

SUMMONS AND COMPLAINT

O'PRY BROTHERS

VS.

HARTFORD FARMS

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

MAR 11 1948

ALICE J. DUCK, Register

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LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

O'PRY BROTHERS,  
W. H. O'Pry and Garland  
O'Pry, Partners,  
Plaintiffs

vs.

HARTFORD FARMS,  
J. C. Van Lierop, Owner  
Defendant

IN THE CIRCUIT COURT OF

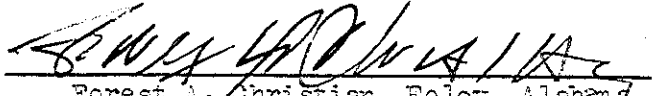
BALEWIN COUNTY, ALABAMA

IN LAW

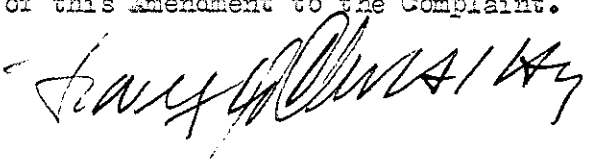
AMENDMENT TO COMPLAINT

The Plaintiffs claim of the Defendant \$550.00, for work and labor done for the Defendant by the Plaintiffs on the 3rd day of January, 1948, at its request, which sum of money, with interest thereon is still unpaid.

The Plaintiffs further allege that T. J. Verdonschot was an agent of the Defendant within this State, who represented or acted for the Defendant as agent in the subject matter of the suit.

  
Forest A. Christian, Foley, Alabama  
Attorney for Plaintiffs

There was attached to the original complaint an itemized statement of the amount of this claim, verified by the affidavit of a competent witness and made before and certified to by a notary public, which shows the amount owed on this claim as of March 3, 1948. The Plaintiffs acknowledge the receipt of a payment of \$265.00, since that date. The itemized statement is made a part of this Amendment to the Complaint.



THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

Whereas, O'PRY BROTHERS, W. H. O'Pry and Garland O'Pry, partners, hath complained on oath to me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, that HARTFORD FARMS, J. C. Van Lierop, owner, is justly indebted to them in the sum of FIVE HUNDRED FIFTY & 00/100 DOLLARS (\$550.00); and Garland O'Pry, a partner, having made affidavit and having chosen not to make bond because the Defendant is a non-resident: You are hereby commanded to attach so much of the estate of said HARTFORD FARMS, J. C. Van Lierop, owner, as will be of value to satisfy the said debts and costs, according to the complaint; and such estate, unless replevied, so to secure that the same may be liable to further proceedings thereon, to be had at the present term of the Circuit Court of Baldwin County, to be held at the Court House thereof, when and where you must make known how you have executed this writ.

Witness: Alice J. Duck, Clerk of said Court, my hand, this the 15<sup>th</sup> day of April, A. D. 1948.

Alice J. Duck  
Clerk

RETURN TO COMPLAINT

O'PRY BROTHERS,  
W. H. O'Pry and Garland O'Pry,  
Partners,  
Plaintiffs

vs.

HARTFORD FARMS,  
J. C. Van Lierop, Owner,  
Defendant

IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA, IN LAW

FILED  
APR 15 1948  
ALICE J. DUCK, Clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

Received in Sheriff's Office  
this 14 day of April, 1948  
TAYLOR WILKINS, Sheriff

AFFIDAVIT FOR ATTACHMENT

THE STATE OF ALABAMA, )  
 )  
BALDWIN COUNTY. )

O'PRY BROTHERS,  
W. H. O'Pry and Garland  
O'Pry, Partners,  
Plaintiffs

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

vs.

IN LAW

HARTFORD FARMS,  
J. C. Van Lierop, Owner,  
Defendant

No. 1151

Before me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, personally appeared Forest A. Christian, attorney, who being duly sworn, deposes and saith:

That Hartford Farms, J. C. Van Lierop, owner, is justly indebted to said O'Pry Brothers in the sum of \$550.00, which said amount is justly due, and that the said J. C. Van Lierop resides out of the State, and that this attachment is not sued out for the purpose of vexing or harassing the said defendant.

Forest A. Christian  
Forest A. Christian, Foley, Alabama,  
Attorney at Law

Sworn to and subscribed before me this the 15<sup>th</sup> day of March, 1948.

Alice J. Duck  
Clerk

AFFIDAVIT FOR ATTACHMENT

O'PRY BROTHERS,  
W. H. O'Pry & Garland O'Pry,  
Partners,  
Plaintiffs

vs.

HARTFORD FARMS,  
J. C. Van Lierop, Owner,  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN LAW, NO. 1151

*Filed*  
*4-15-48*  
*Alice J. Welch*  
*Clerk*

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

May 8, 1948

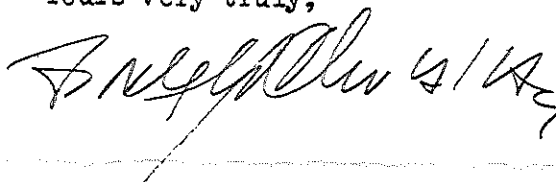
Mrs. Alice J. Duck  
Clerk of Court  
Bay Minette, Alabama

Dear Mrs. Duck:

You are hereby authorized and instructed to dismiss the case of O'Pry Brothers, W. H. O'Pry and Garland O'Pry, Partners, Plaintiffs, vs. Hartford Farms, J. C. Van Lierop, owner, Defendant, which is a law case, the debt having been paid in full.

There is enclosed a check, which you are authorized to fill in the amount of the court costs. Since I intend to be in your office on Monday, you need not mail the receipt as I will get it then.

Yours very truly,

A handwritten signature in dark ink, appearing to read "Forest A. Christian", with a date "5/14/48" written to the right of the signature.

Enclosure - check



LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

April 14, 1948

Mrs. Alice J. Duck  
Clerk of Court  
Bay Minette, Alabama

Re: O'Pry Brothers  
vs: Hartford Farms

Dear Mrs. Duck:

Enclosed is an Amendment to Complaint in the case mentioned above, which I hope will be satisfactory.

We are, of course, going to have to give notice by publication, as set out in Tit. 7, Sec. 852, Code of Alabama.

The Defendant's address is:

J. C. Van Lierop  
c/o Hartford Farms  
Hartford, Michigan

I would like this put in the Foley Onlooker. If you will let me know when the sheriff makes his return and give me a list of the property that he attaches, I shall be glad to prepare this notice.

Yours very truly,

*For F. A. Christian*

O'PRY BROTHERS,  
W. H. O'Pry and Garland  
O'Pry, Partners,  
Plaintiffs

vs.

HARTFORD FARMS,  
J. C. Van Lierop, Owner  
Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

AMENDMENT TO COMPLAINT

The Plaintiffs claim of the Defendant \$550.00, for work and labor done for the Defendant by the Plaintiffs on the 3rd day of January, 1948, at its request, which sum of money, with interest thereon is still unpaid.

The Plaintiffs further allege that T. J. Verdonschot was an agent of the Defendant within this State, who represented or acted for the Defendant as agent in the subject matter of the suit.

*Forest A. Christian, Foley, Alabama*  
Forest A. Christian, Foley, Alabama  
Attorney for Plaintiffs

There was attached to the original complaint an itemized statement of the amount of this claim, verified by the affidavit of a competent witness and made before and certified to by a notary public, which shows the amount owed on this claim as of March 3, 1948. The Plaintiffs acknowledge the receipt of a payment of \$265.00, since that date. The itemized statement is made a part of this Amendment to the Complaint.

AMENDMENT TO COMPLAINT

Hartford Farms,  
W. H. O'Pry and Garland O'Pry,  
O'Pry Brothers,  
Plaintiffs

vs.

J. C. Van Lierop, Owner  
Hartford Farms,  
Defendant

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

FILED  
APR 12 1948  
WILLIAM H. CARR

AMENDMENT TO COMPLAINT

O'PRY BROTHERS,  
W. H. O'PRY and GARLAND O'PRY  
Partners  
Plaintiffs,

vs.

HARTFORD FARMS,  
J. C. Van Lierop, Owner  
Defendant

IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA, IN LAW

FILED  
APR 15 1948  
ALICE J. DUCK, Clerk

of this amendment to the Complaint.  
Itemized statement is made as here  
of \$225.00, since first date. The  
knowledge the receipt of a balance  
March 2, 1948. The Plaintiff's so-  
the amount owed on this claim as of  
to it a receipt which shows  
near any wage before unaccounted  
in the statement of a competent wit-  
the amount of this claim, verified  
complaint an itemized statement of  
there was attached to the original

Appointed for Plaintiff  
Walter V. O'Pray, Jr., Attorney

as seen in the subject matter of the suit.  
the Defendant within this State, who represented or acted for the Defendant  
the Plaintiff further allege that W. H. O'Pray, Jr. and O'Pray Brothers  
refused to pay any of money, with interest thereon is still owing.

For the Defendant in the Plaintiff on the 2nd day of January, 1948, at its  
the Plaintiff claim of the Defendant \$225.00, for work and labor done

AMENDMENT TO COMPLAINT

Defendant  
J. C. Van Lierop, Owner  
HARTFORD FARMS,

as

Plaintiff  
O'Pray Brothers,  
W. H. O'Pray and Garland  
O'Pray Brothers,

IN LAW

ATTORNEY GENERAL, ATTORNEY  
IN THE CIRCUIT COURT OF

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, }  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. ....

.....TERM, 194....

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You Are Hereby Commanded to Summon

*Hartford Farms*

*J. C. Van Lierop, owner*

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

*Hartford Farms*

, Defendant....

by

*Opry Brothers*

, Plaintiff....

Witness my hand this

*15-*

day of

*April*

194*5*

*Alice L. Leach*, Clerk.

AFFIDAVIT FOR ATTACHMENT

THE STATE OF ALABAMA, )  
 )  
BALDWIN COUNTY. )

O'PRY BROTHERS,  
W. H. O'Pry and Garland  
O'Pry, Partners,  
Plaintiffs

vs.

HARTFORD FARMS,  
J. C. Van Lierop, Owner,  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN LAW

No. 1151

Before me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County,  
personally appeared Forest A. Christian, attorney, who being duly sworn,  
deposes and saith:

That Hartford Farms, J. C. Van Lierop, owner, is justly indebted to said  
O'Pry Brothers in the sum of \$550.00, which said amount is justly due, and  
that the said J. C. Van Lierop resides out of the State, and that this attach-  
ment is not sued out for the purpose of vexing or harassing the said defendant.

Forest A. Christian  
Forest A. Christian, Foley, Alabama,  
Attorney at Law

Sworn to and subscribed before me this the 15<sup>th</sup> day of March, 1948.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

FOREST A. CHRISTIAN,  
ATTORNEY AT LAW

Clerk

ALICE J. DUCK

O. H. BROTHERS

W. H. O'PRY & GARLAND

AFFIDAVIT FOR ATTACHMENT

O'PRY BROTHERS,  
W. H. O'Pry & Garland O'Pry,  
Partners

Plaintiffs

vs.

HARTFORD FARMS,  
J. C. Van Lierop, Owner  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN LAW, NO. 1151

STATE OF ALABAMA, ss. I, J. C. Van Lierop, do hereby certify that the foregoing is a true and correct copy of the original as the same appears in the records of the Circuit Court of Baldwin County, Alabama.

Witness my hand and seal of office this 1st day of May, 1911.

J. C. Van Lierop, Clerk of the Circuit Court of Baldwin County, Alabama.

*[Signature]*

NOTICE TO THE DEBTOR: The undersigned, J. C. Van Lierop, Clerk of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a true and correct copy of the original as the same appears in the records of the Circuit Court of Baldwin County, Alabama.

Witness my hand and seal of office this 1st day of May, 1911.

J. C. Van Lierop, Clerk of the Circuit Court of Baldwin County, Alabama.

Deponent

J. C. Van Lierop, Clerk of the Circuit Court of Baldwin County, Alabama.

Subscribed and sworn to before me this 1st day of May, 1911.

at

Deponent

J. C. Van Lierop, Clerk of the Circuit Court of Baldwin County, Alabama.

Subscribed and sworn to before me this 1st day of May, 1911.

Deponent

J. C. Van Lierop, Clerk of the Circuit Court of Baldwin County, Alabama.

NOTICE TO THE DEBTOR: The undersigned, J. C. Van Lierop, Clerk of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a true and correct copy of the original as the same appears in the records of the Circuit Court of Baldwin County, Alabama.

AFFIDAVIT FOR ATTACHMENT

THE STATE OF ALABAMA, )  
 )  
BALDWIN COUNTY. )

O'PRY BROTHERS,  
W. H. O'Pry and Garland  
O'Pry, Partners,  
Plaintiffs

vs.

HARTFORD FARMS,  
J. C. Van Lierop, Owner,  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN LAW

No. 1151

Before me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, personally appeared Forest A. Christian, attorney, who being duly sworn, deposes and saith:

That Hartford Farms, J. C. Van Lierop, owner, is justly indebted to said O'Pry Brothers in the sum of \$550.00, which said amount is justly due, and that the said J. C. Van Lierop resides out of the State, and that this attachment is not sued out for the purpose of vexing or harassing the said defendant.

*Forest A. Christian*  
Forest A. Christian, Foley, Alabama  
Attorney at Law

Sworn to and subscribed before me this the 15<sup>th</sup> day of March, 1948.

IN TEST: NO. 1151  
BALDWIN COUNTY, ALABAMA  
IN THE OFFICE COURT OF

*Alice J. Duck*  
Clerk  
J. C. Van Lierop, Owner  
Hartford Farms  
vs.  
O'Pry Brothers  
W. H. O'Pry & Garland  
O'Pry Brothers  
BALDWIN COUNTY, ALABAMA

# AFFIDAVIT FOR ATTACHMENT

O'PRY BROTHERS,  
W. H. O'Pry & Garland O'Pry,  
Partners,  
Plaintiffs

vs.

HARTFORD FARMS,  
J. C. Van Lierop, owner,  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN LAW, NO. 1151

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4-13-48  
Avery Houch  
Jacks

APPROVED & FOR  
RELEASE BY COMPTON, BLOOM &  
DAVIS

[illegible]

1. The first step is to identify the problem.
 2. The second step is to analyze the problem.
 3. The third step is to develop a solution.
 4. The fourth step is to implement the solution.
 5. The fifth step is to evaluate the solution.

[illegible]

1. *Chlorophyll a* (Chl *a*)  
 2. *Chlorophyll b* (Chl *b*)  
 3. *Chlorophyll c* (Chl *c*)  
 4. *Chlorophyll d* (Chl *d*)  
 5. *Chlorophyll e* (Chl *e*)  
 6. *Chlorophyll f* (Chl *f*)  
 7. *Chlorophyll g* (Chl *g*)  
 8. *Chlorophyll h* (Chl *h*)  
 9. *Chlorophyll i* (Chl *i*)  
 10. *Chlorophyll j* (Chl *j*)  
 11. *Chlorophyll k* (Chl *k*)  
 12. *Chlorophyll l* (Chl *l*)  
 13. *Chlorophyll m* (Chl *m*)  
 14. *Chlorophyll n* (Chl *n*)  
 15. *Chlorophyll o* (Chl *o*)  
 16. *Chlorophyll p* (Chl *p*)  
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 19. *Chlorophyll s* (Chl *s*)  
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 22. *Chlorophyll v* (Chl *v*)  
 23. *Chlorophyll w* (Chl *w*)  
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 25. *Chlorophyll y* (Chl *y*)  
 26. *Chlorophyll z* (Chl *z*)  
 27. *Chlorophyll aa* (Chl *aa*)  
 28. *Chlorophyll ab* (Chl *ab*)  
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 38. *Chlorophyll al* (Chl *al*)  
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 40. *Chlorophyll an* (Chl *an*)  
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 43. *Chlorophyll aq* (Chl *aq*)  
 44. *Chlorophyll ar* (Chl *ar*)  
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O'FRY BROTHERS,  
W. H. O'FRY and GARLAND  
O'FRY, Partners

Plaintiffs

vs.

HARTFORD FARMS,  
J. C. VAN LIEROP, Owner,  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN LAW

Comes the Defendant, J. C. Van Lierop, for the special purpose of this motion and no other, and without waiving proper service, moves the Court to quash the service in said cause and as grounds therefor, says that summons and complaint was not served on him nor on anyone authorized by him to accept service; that he is a non-resident of the State of Alabama and was not within the State of Alabama on the date on which the summons and complaint is shown to have been served.

  
Attorney for Defendant

1157

MOTION TO QUASH

O'RY BROTHERS,  
W. H. O'RY and GARLAND O'RY,  
Partners,

Plaintiffs,

vs.

HARTFORD FARMS,  
J. C. VAN LIEROP, Owner,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

CECIL G. CHASON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

*Filed*  
*4-5-48*  
*Alice Muck*  
*clerk*