

1669

NITROGEN SERVICE COMPANY,
Plaintiff,
Vs.
GROVER LASSITER,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
OF LAW. NO. 1669

Notice is hereby given unto Forrest A. Christian, Attorney for the Plaintiff in the above styled cause, that the Defendant has made an unqualified appearance in said cause.

W. J. Duck
Clerk.

RECEIVED
JAN 10 1908
BALDWIN COUNTY, ALABAMA
CIRCUIT COURT OF LAW

NITROGEN SERVICE COMPANY

PLAINTIFF

GROVER LASSITER

DEFENDANT

RECEIVED
JAN 10 1908
BALDWIN COUNTY, ALABAMA
CIRCUIT COURT OF LAW

Summerdale, ALA., May 5,

1954

Mr. Grover Lassitter

IN ACCOUNT WITH

Horace Kennedy, Summerdale, Ala.

1950			Debits	Credits
Feb	23	2½ ton 4-10-7	\$ 100 00	\$
Mar	3	2# Colorado	4 00	
		1# Marketer	2 00	
	13	2 bu. Wisc. 7	13 00	
		2 bu. Yellow Dent	11 00	
	14	2 ton 4-10-7	80 00	
	18	3 ton 4-10-7	117 00	
	31	8# Marketer	16 00	
		15 bags 4-10-7	30 00	
		1 ton 4-10-7	40 00	
May	5	1 Pl. Hexamite	2 25	
		18# Cocs Spray	6 12	
		Tax	17	
June	23	On account out of Cukes		163 16
		Unpaid Balance:		\$ 258 38

RECORDED

NOTICE TO PLAINTIFF OF
DEFENDANT'S UNQUALIFIED
APPEARANCE.

NITROGEN SERVICE COMPANY,
PLAINTIFF,

VS:
GROVER LASSITER,
DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 1669

Notice is hereby given unto Grover Lassiter, Defendant, that the Defendant has failed to appear in the above styled cause, and that the Plaintiff has failed to appear in the above styled cause.

Defendant's
GROVER LASSITER
VS
NITROGEN SERVICE COMPANY, Plaintiff

ON FILE
BALDWIN COUNTY, ALABAMA
IN THE CIRCUIT COURT OF

1669

HORACE KENNEDY,

PLAINTIFF

VS:

GROVER LASSITER,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

INTERROGATORIES FILED BY THE PLAINTIFF TO THE DEFENDANT

Now comes the plaintiff and files the following interrogatories to the defendant, GROVER LASSITER:

1. You will find attached to these interrogatories a statement made by HORACE KENNEDY dated May 5, 1951. Is this statement a true and correct statement of your account?

2. If this statement is not correct, please state what items are in error.

3. Are you entitled to credits other than those shown in said statement to wit:

6-23-50 - - for cucumbers delivered to plaintiff \$163.16

4. If you state that you are entitled to other credits, please state the dates of these credits and the amounts thereof.

5. Were payments made by cash or check and do you have a receipt for these payments and what date were these payments made?

Harry A. Christman
Attorneys for the Plaintiff.

AFFIDAVIT

THE STATE OF ALABAMA,)

BALDWIN COUNTY)

Before me, Elinor Harrell a Notary Public in and for said County in and said, personally appeared FOREST A. CHRISTIAN, known to me, who being first duly sworn, deposed and says that he is of counsel for the plaintiff in the above styled cause; that the answers to the foregoing interrogatories truthfully made will be material evidence for the plaintiff in the trial of said cause.

Elinor Harrell

Sworn to and subscribed to
by me this the 17th day of
September, 1951.

Elinor Harrell

1668

FILED

SEP 18 1961

U.S. DEPT. OF JUSTICE

TO THE ATTORNEY GENERAL, WASHINGTON, D.C.

FROM THE ATTORNEY GENERAL, WASHINGTON, D.C.

SUBJECT: [Illegible]

RE: [Illegible]

DATE: [Illegible]

BY: [Illegible]

FOR THE ATTORNEY GENERAL, WASHINGTON, D.C.

[Illegible]

[Illegible]

[Illegible]

[Illegible]

[Illegible]

[Illegible]

NOTICE TO INVITE OF

H. KENNEDY,

Plaintiff

VS.

GROVER LASSITER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

NO. 1668

Notice is hereby given unto Forrest A. Christian, attorney for the Plaintiff in the above styled cause, that the Defendant has made an unqualified appearance in said cause.

Forrest A. Christian
Clerk.

RECORDED

NOTICE TO PLAINTIFF OF
DEFENDANT'S UNQUALIFIED
APPEARANCE.

H. KENNEDY,

PLAINTIFF,

VSE.

GROVER LASSITER,

DEFENDANT.

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

NO. 1668

RECORDED

MOTION TO ENFORCE PENALTY

NITROGEN SERVICE COMPANY,

PLAINTIFF

VS:

GROVER LASSITER,

DEFENDANT

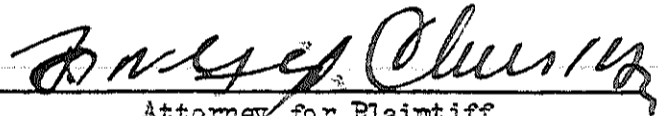
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW. NO. 1689

TO THE HONORABLE JUDGE OF SAID COURT:

Comes the Plaintiff and shows unto the Court that, pursuant to law in such cases made and provided, the Plaintiff propounded interrogatories to the Defendant in the above styled cause; that same were served as required by law; that the time allowed by law in which to answer said interrogatories has expired; and that the Defendant has not answered said interrogatories.

Wherefore, the Plaintiff moves the Court (1) to require the Defendant to answer said interrogatories on or before a day certain to be fixed by the Court; (2) to impose upon the Defendant such penalties as are provided by law for Defendant's failure to answer said interrogatories; and (3) to order that said cause be dismissed without further or additional notice to the Defendant if the Defendant fails or refuses to answer said interrogatories on or before the date fixed by the Court by which the defendant is required to answer.


Attorney for Plaintiff

TO J. B. BLACKBURN
Attorney of record for Defendant

Please take notice that the above motion has been filed in the Circuit Court of Baldwin County, Alabama, and that said motion is set for hearing on the 3 day of December, 1951.


Attorney for Plaintiff

I hereby certify that I have mailed a copy of the foregoing motion and notice to Defendant's attorney of record, this the 3 day of December, 1951.


Of Counsel for Plaintiff

NO. 1669

NO. 1669

FILED

RECORDED

INDEXED

107

CLERK

NOV 20 1951

THE COURT OF THE COUNTY OF BALDWIN, ALABAMA, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files of the Court.

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the Court at Baldwin, Alabama, this 16th day of November, 1951.

[Handwritten signature]

CLERK OF COURT

MOTION TO ENFORCE PENALTY

NITROGEN SERVICE COMPANY

PLAINTIFF

VS.

GROVER LASSITER

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW No. 1669

RECORDED

FILED

DEC 3 1951

ALICE I. DUCK, Clerk

[Handwritten signature]

CLERK OF COURT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 1669

Now comes the Defendant and for answer to the Complaint filed in this cause and to each and every count thereof, separately, and severally, says:

J. B. Blackburn
Attorney for Defendant

J. B. Blochman
Attorney for Defendant.

PLEA

NITROGEN SERVICE COMPANY,

PLAINTIFF

VS:

GROVER LASSITER,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

NO. 1669

RECORDED

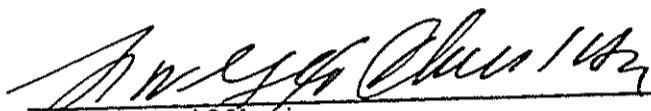
Filed: 9-4-51
Alice J. Duck, Clerk

AFFIDAVIT OF FOREST A. CHRISTIAN


THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

FOREST A. CHRISTIAN, first being duly sworn, deposes and says
as follows:

That he is the attorney of record for Nitrogen Service Company,
the Plaintiff in the case of NITROGEN SERVICE COMPANY VS: GROVER LASSITER;
that the said Defendant is a non-resident of the State of Alabama; that he is
believed to reside in the City of Pontiac, State of Michigan, but his address is
otherwise unknown, or if a resident of the State of Alabama, he has been absent
from the State for a period of at least six (6) months prior to the institution
of these proceedings. And the Defendant, to the best information and belief
of the affiant is over the age of twenty-one years. The address of the
Defendant after reasonable effort, cannot be ascertained, and is unknown to
affiant other than he is believed to reside in the City of Pontiac, Michigan;
that the affiant has inquired in and about the vicinity of Summerdale, Alabama,
the Defendant's former home.


Affiant

Sworn to and subscribed before me,
a Notary Public in and for Baldwin
County, Alabama, this the 5th
day of June, 1951.


Notary Public

CHIEF CLERK
COURT OF ALABAMA

CLERK OF COURT

NOTARY

AS:

CHIEF CLERK

NOTARY

IN THE CIRCUIT COURT OF THE

STATE OF ALABAMA

OF ALABAMA

RECORDED

JUN 10 1951
JUN 10 1951
JUN 10 1951

201669

AFFIDAVIT OF FOREST A.
CHRISTIAN

NITROGEN SERVICE COMPANY

PLAINTIFF

VS:

GROVER LASSITER,

DEFENDANT

IN THE CIRCUIT COURT OF THE
TWENTY EIGHTH JUDICIAL CIRCUIT
OF ALABAMA AT LAW

RECORDED

FILED
JUN 6 1951

J. DUCK, Register

NOTARY PUBLIC

NOTARY PUBLIC

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NOTARY PUBLIC

NOTARY PUBLIC

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NOTARY PUBLIC

AFFIDAVIT FOR ATTACHMENT

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

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

That Grover Lassiter is justly indebted to the said Nitrogen Service Company, in the sum of TWO HUNDRED ONE & 11/100 DOLLARS (\$201.11) which amount is justly due, and that the said Grover Lassiter resides out out of the state, and that this attachment is not sued out for the purpose of vexing or harrassing the said defendant.

Forest A. Christian
Forest A. Christian, Affiant

Sworn to and subscribed before me this the 6th day of June, 1951.

Alice J. Duck
Clerk

RECEIVED FOR ATTACHMENT

NITROGEN SERVICE COMPANY

RECEIVED

BY:

CLERK OF THE CIRCUIT COURT

RECEIVED

RECORDED

IN THE CIRCUIT COURT OF THE

STATE OF ALABAMA

OF THE COUNTY OF BALDWIN

RECEIVED
JUN 10 1951
CLERK OF THE CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

[illegible][illegible][illegible]

1. The first step in the process of creating a new product is to identify a market need. This involves conducting market research to understand what consumers want and what problems they are trying to solve.

[illegible]

[Handwritten signature]

to my secretary before she left to go to work.

1000

AFFIDAVIT FOR ATTACHMENT

NITROGEN SERVICE COMPANY,
PLAINTIFF

VS:

GROVER LASSITER,
DEFENDANT

RECORDED

IN THE CIRCUIT COURT OF THE
TWENTY EIGHTH JUDICIAL CIRCUIT
OF ALABAMA - AT LAW

FILED
JUN 6 1951

Register

HOWELL PUBLISHING CO.

HIGH QUALITY JOB PRINTING

Alice J. DuckBay Minette, Ala.

Brought Forward

June 14	Legal notice
" 21	for
" 28	H. Kennedy

\$8.68

COMPLAINT

NITROGEN SERVICE COMPANY,

PLAINTIFF

VS:

GROVER LASSITER,

DEFENDANT,

IN THE CIRCUIT COURT OF THE

TWENTY EIGHTH JUDICIAL CIRCUIT

OF ALABAMA - AT LAW

BALDWIN COUNTY, ALABAMA

COUNT I:

The Plaintiff claims of the Defendant the sum of TWO HUNDRED ONE & 11/100 DOLLARS (\$201.11), together with interest thereon, due from him by account on, to wit: the 3rd day of May, 1950, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of TWO HUNDRED ONE & 11/100 DOLLARS (\$201.11), together with interest thereon, due from him on account stated between the Plaintiff and the Defendant on, to wit: the 3rd day of May, 1950, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant the sum of TWO HUNDRED ONE & 11/100 DOLLARS (\$201.11), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 3rd day of May, 1950, which sum of money, with interest thereon, is still unpaid.

James C. Chislow
Attorney for Plaintiff

LEGAL NOTICE

NOTICE OF ATTACHMENT TO NON-RESIDENT DEFENDANT BY PUBLICATION

H. Kennedy, Plaintiff, vs. Grover
Lassiter, Defendant.

Nitrogen Service Company,
Plaintiff, vs. Grover Lassiter, De-
fendant.

In the Circuit Court of the
Twenty-Eighth Judicial Circuit of
Alabama—At Law.

Baldwin County, Alabama.

Whereas, the Plaintiffs, H. Ken-
nedy and Nitrogen Service Compa-
ny, in the above stated causes,
sued out in said Court writs of at-
tachment against the estate of the
Defendant, Grover Lassiter; and,
whereas, said writs of attachment
were executed by the Sheriff of
Baldwin County, Alabama, on the
7th day of June, 1951, by levying
upon the following described prop-
erty of the Defendant, to wit:

The North Half (N $\frac{1}{2}$) of
the Northwest Quarter
(NW $\frac{1}{4}$) of the Southwest
Quarter (SW $\frac{1}{4}$) of the South-
west Quarter (SW $\frac{1}{4}$), Section
Twenty-Four (24), Township
Six (6) South, Range Four

(4) East, Baldwin County,
Alabama.

And whereas the said Defend-
ant is a non-resident of the State
of Alabama, and that the place of
residence and post office address
of said defendant is believed to be
Pontiac, Michigan, his address oth-
erwise being unknown. Now, there-
fore, the Defendant, Grover Las-
siter, is hereby notified of the
issuance of said attachments and
the executions thereof, and to be
and appear if he thinks proper, to
defend said suits at the present
term of said Court and within
thirty days after this notice by
publication is completed.

Witness my hand this 6th day of
June, 1951.

ALICE J. DUCK,
Clerk.

FOREST A. CHRISTIAN,
Attorney for Plaintiffs.

6-14-51

THE STATE OF ALABAMA, }
BALDWIN COUNTY. }

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

Whereas, Forest A. Christian, as attorney and agent for Nitrogen Service Company, hath complained on oath to me, ALICE J. DUCK, Clerk of the Circuit Court of Baldwin County, that GROVER LASSITER is justly indebted to NITROGEN SERVICE COMPANY in the sum of TWO HUNDRED ONE & 11/100 DOLLARS (\$201.11); and that said Forest A. Christian having caused to be made affidavit as required by law in such cases: You are hereby commanded to attach so much of the estate of said GROVER LASSITER as will be of value to satisfy the said debt 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 session of the Circuit Court of Baldwin County, Alabama, to be held at the Courthouse thereof, when and where you must make known how you have executed this writ.

Witness my hand, this the 6th day of June, A.D., 1951.

Alice J. Duck
Circuit Clerk

COMPLAINT

NITROGEN SERVICE COMPANY,

PLAINTIFF

VS:

GROVER LASSITER,

DEFENDANT

IN THE CIRCUIT COURT OF THE
TWENTY EIGHTH JUDICIAL CIRCUIT
OF ALABAMA - AT LAW

FILED
JUN 6 1951

ALICE J. DUCK, Register

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

RECORDED

TAYLOR WILKINS, Sheriff
SHERIFF'S RETURN:

Executed the within writ of attachment this the 7th day of June, 1951, at 11:20 AM o'clock by delivering the Notice of Attachment to Non-Resident to the Judge of Probate of Baldwin County, Alabama, for record in his Penders Book.

Taylor Wilkins
Sheriff, Baldwin County, Ala.

AFFIDAVIT OF PUBLICATION

I, Emm Souell

Publisher

of The Onlooker, published at

Boley, Ala., do solemnly swear that a copy of the above notice,
as per clipping attached, was published once each week in the
regular and entire edition of said newspaper, and not in any
supplement thereof, for Three consecutive weeks, com-

encing with the issue dated June 14, 1951, and
ending with the issue dated June 28, 1951.

Emm Souell

Subscribed and sworn to before me this 20 day

June, 1951

[Signature]
Notary Public.

NOTES: JUNE 14, 1951

NITROGEN SERVICE COMPANY,

PLAINTIFF

VS:

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

GROVER LASSITER,

DEFENDANT

INTERROGATORIES FILED BY THE PLAINTIFF TO THE DEFENDANT.

Now comes the plaintiff and files the following interrogatories to the defendant, GROVER LASSITER.

1. A statement of this account rendered by the plaintiff.
 - a. April 28, 1950 - - 354 gallons of 1823 NIS @ \$74 = \$127.61.
 - b. Spraying 30 acres of land - - \$90.00 217.61.
 - c. May 3, 1951 - - credit for labor on account,
15 hours @ \$1.10 - - 16.50.
 - d. Balance due - - - - - 201.11.

Is this statement a true and correct statement of your account?

2. If this statement is not correct, please state what items are in error.

3. Are you entitled to any credits other than those given for labor if shown in said statement.

4. If you state that you are entitled to other credits, please state the dates of these credits and the amounts thereof.

5. Were payments made by cash or check and do you have a receipt for these payments and what date were these payments made?

Wm. A. Chumley
Attorney for the Plaintiff.

AFFIDAVIT

THE STATE OF ALABAMA,)

BALDWIN COUNTY)

Before me, Elinor Harrell, a notary public in and for said County in said State, personally appeared FOREST A. CHRISTIAN, known to me, who being first duly sworn, deposes and says that he is of counsel for the plaintiff in the above styled cause; that the answers to the foregoing interrogatories truthfully made will be material in the trial of said cause.

Elinor Harrell

Sworn to and subscribed to by
me this the 17th day of September, 1951.

Elinor Harrell

Handwritten signature

TO THE DIRECTOR OF THE BUREAU OF REVENUE
WASHINGTON, D. C.

Handwritten signature

FOR THE PURPOSE OF THE BUREAU OF REVENUE
TO THE DIRECTOR OF THE BUREAU OF REVENUE
WASHINGTON, D. C.

RECEIVED

Handwritten signature

FOR THE PURPOSE OF THE BUREAU OF REVENUE
TO THE DIRECTOR OF THE BUREAU OF REVENUE
WASHINGTON, D. C.

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WASHINGTON, D. C.

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FILED
SEP 18 1951
JACE L. DUCK, CLERK