

1720

AFFIDAVIT OF HORACE KENNEDY:

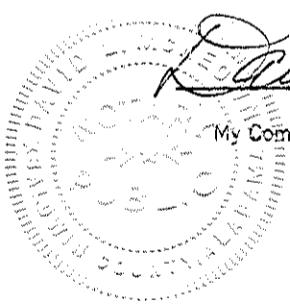
THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

HORACE KENNEDY, first being duly sworn, deposes and says as follows:

My name is Horace Kennedy; I am the plaintiff in the case of HORACE KENNEDY VS: SYLVESTER R. ARD; the defendant, SYLVESTER R. ARD, purchased fertilizer, soda and seeds from me on a charge account, the last item of which was purchased on May 13, 1949, and the balance due on this account, after allowing all just credits, is ONE HUNDRED EIGHTY THREE & 00/100 DOLLARS (\$183.00), together with interest.

Horace Kennedy  
Horace Kennedy, Affiant

Sworn to and subscribed before me  
a Notary Public in and for Baldwin  
County, Alabama, this the Nov 4  
day of November, 1951.

David McRae  
Notary Public  
My Commission Expires Nov. 5, 1951.  


MOTION FOR JUDGMENT BY DEFAULT

HORACE KENNEDY, )  
PLAINTIFF ) IN THE CIRCUIT COURT OF  
VS: ) BALDWIN COUNTY, ALABAMA  
SYLVESTER R. ARD, ) AT LAW NO. 1700  
DEFENDANT )

Comes the Plaintiff by his attorney, and moves the Court to render Judgment by Default in the amount of ONE HUNDRED EIGHTY THREE & 00/100 DOLLAR S (\$183.00), together with interest thereon, against the defendant,

There is attached and made a part of this Motion for Judgment by Default, an affidavit of a competent witness sworn to before a notary public,

  
James G. Clanton  
Attorney for Plaintiff

MOTION FOR JUDGMENT BY DEFAULT

HORACE KENNEDY,

PLAINTIFF

VS:

SYLVESTER R. ARD,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 1700

RECORDED

Filed 11-14-57  
R. C. Green  
Court Clerk

SUMMONS

THE STATE OF ALABAMA,

BALDWIN COUNTY

To THE SHERIFF OF THE STATE OF ALABAMA - GREETING: -

YOU ARE HEREBY COMMENDED to summon SYLVESTER R. ARD 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 SYLVESTER R. ARD, by HORACE KENNEDY.

WITNESS my hand this the 12<sup>th</sup> day of September, 1951

Alice J. Wink

|||||

COMPLAINT

HORACE KENNEDY,

IN THE CIRCUIT COURT OF

PLAINTIFF

BALDWIN COUNTY, ALABAMA.

VS:

SYLVESTER R. ARD,

AT LAW

DEFENDANT

COUNT I:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED EIGHTY THREE & 00/100 DOLLARS (\$183.00), together with interest thereon, due from him by account on, to wit: the 1st day of September, 1951, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED EIGHTY THREE & 00/100 DOLLARS (\$183.00), together with interest thereon, due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of September, 1951, which sum of money with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED EIGHTY THREE & 00/100 DOLLARS (\$183.00), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of September, 1951, which sum of money, with interest thereon, is still unpaid.

Margie Clues/102  
Attorney for Plaintiff

The Defendant lives at:  
Summerdale, Alabama.

Received in Sheriff's Office  
this 12 day of Oct., 1951  
TAYLOR WILKINS, Sheriff

M 1700

HORACE KENNEDY,

PLAINTIFF

VS:

SYLVESTER R. ARD,

DEFENDANT

SUMMONS & COMPLAINT

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

LAW OFFICE OF  
FOREST A. CHRISTIAN  
SPOLEY, ALABAMA

Alice J. Duck, Clerk

SUMMONS

THE STATE OF ALABAMA,  
BALDWIN COUNTY.)

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

YOU ARE HEREBY COMMANDED to summon SYLVESTER R. ARD 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 SYLVESTER R. ARD, by HORACE KENNEDY.

WITNESS my hand this the 12<sup>th</sup> day of September, 1951

Horace Kennedy  
CLERK

HORACE KENNEDY,

VS:

SYLVESTER R. ARD,

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

MONDAY

COMPLAINT

COUNT I:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED EIGHTY THREE & 00/100 DOLLARS (\$183.00), together with interest thereon, due from him by account on, to wit: the 1st day of September, 1951, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED EIGHTY THREE & 00/100 DOLLARS (\$183.00), together with interest thereon, due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of September, 1951, which sum of money with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED EIGHTY THREE & 00/100 DOLLARS (\$183.00), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of September, 1951, which sum of money, with interest thereon, is still unpaid.

Bryce Oliver  
Attorney for Plaintiff

The Defendant lives at:  
Summerville, Alabama.

PLAINTIFF

KENNEDY,

RECEIVED -

ALABAMA TO PAYEE

REGULAR

SUITING HER REASONS OF GRIEVANCE AND DEMANDS OF DEFENDANT TAKEN UP IN

DEFENDANT WITHIN 60 DAYS OF THIS DATE OR ELSE IT IS HEREBY ORDERED THAT THE PLAINTIFF BE ALLOWED TO STATE HIS CASE IN THE COURT OF COMMON PLEAS OF BALDWIN COUNTY ON THE 10TH DAY OF NOVEMBER 1951.

RECEIVED -

ALABAMA TO PAYEE

REGULAR

PLAINTIFF  
KENNEDY,  
AND,  
DEFENDANT

NOV 10 1951

KENNEDY,

TO JUDGE RUBERT ERICKSON

ATMOSPHERE, ALABAMA, USA

HORACE

ATMOSPHERE, ALABAMA, USA

WILLIE

ATMOSPHERE, ALABAMA, USA

CIRCUIT COURT OF  
THE STATE OF ALABAMA  
BALDWIN COUNTY, ALABAMA, AT

LAW

FILED

SEP. 12 1951

NICE L. DUCK, Clerk

SUITING HER REASONS OF GRIEVANCE AND DEMANDS OF DEFENDANT WITHIN 60 DAYS OF THIS DATE OR ELSE IT IS HEREBY ORDERED THAT THE PLAINTIFF BE ALLOWED TO STATE HIS CASE IN THE COURT OF COMMON PLEAS OF BALDWIN COUNTY ON THE 10TH DAY OF NOVEMBER 1951.

RECEIVED -

ALABAMA TO PAYEE

REGULAR

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ALABAMA TO PAYEE

REGULAR