

STATE OF ALABAMA  
BALDWIN COUNTY

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

You are hereby commanded to summon KERMIT FLOWERS, of Foley, Alabama, to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur, within thirty days from service hereof to the complaint of FOLEY TRACTOR CO., INC.

Witness my hand, this 15 day of April, 1970.

*Alice J. Duck*  
Clerk of the Court

\* \* \* \* \*

FOLEY TRACTOR CO., INC.,	)	
AN ALABAMA CORPORATION,	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
v.	)	AT LAW
KERMIT FLOWERS,	)	NO. 9216
Defendant	)	

COMPLAINT

The Plaintiff claims of the Defendant the sum of One thousand Nine hundred and Twenty-four and 53/100ths(\$1,924.53) Dollars as damages for breach of a conditional sales contract, executed on August 30, 1966, whereby Plaintiff agreed to deliver a Massey-Ferguson Super 92 self-propelled combine with 12' header, chopper, and header control, to the Defendant and Defendant agreed to pay the purchase price. And although the Plaintiff has complied with all its provisions on its party, the Defendant has failed to pay the purchase price, and the amount due, after all credits, is \$1,724.53, and Plaintiff also asks for a reasonable attorney's fee for collection as provided in the contract, in the amount of \$200.00.

*Daniel E. Robison*  
Daniel E. Robison  
Plaintiff's Attorney

FILED

APR 15 1970

ALICE J. DUCK  
CLERK  
REGISTER

We the jury, find for the Plaintiff  
and assess his damages at the amount  
of \$1124.74 plus ~~\$170.00~~ attorney  
fee

Ann Alfred  
Foreman

\* \* \* \* \*

No. 9216  
Foley Tractor Co. Inc.  
vs.  
Kermit Flowers

FILED  
APR 15 1970  
ALICE J. DUCK CLERK  
REGISTER

Received 15 day of April 1970  
and on 5 day of May 1970  
I served a copy of the within on  
Kermit Flowers  
By service on  
TAYLOR WILKINS, Sheriff  
D. S.

Sheriff claims 72 miles at  
Ten Cents per mile Total \$ 7.20  
TAYLOR WILKINS, Sheriff  
DEPUTY SHERIFF

FOLEY TRACTOR COMPANY, X  
INC., an Alabama X  
Corporation, X IN THE CIRCUIT COURT OF  
  
Plaintiff, X BALDWIN COUNTY, ALABAMA  
  
vs. X AT LAW  
  
KERMIT FLOWERS, X CASE NO. 9216  
  
Defendant. X

Comes now the Defendant in the above styled cause and  
for further answer to the Plaintiff's Complaint, says:

3.

That the Plaintiff did, prior to the filing of this  
suit, repossess the machinery and equipment as set out in the  
Complaint, and that the said machinery and equipment is now in  
the possession of the Plaintiff, and that the Defendant has not  
been given credit for the value of the same. The Defendant  
further says that the value of the machinery and equipment exceeded  
the value of the balance due under the terms of the contract at  
the time the same was repossessed by the Plaintiff.

WILTERS & BRANTLEY

BY: 

Attorneys for Defendant

*Filed 4-15-71*  
*Eunice B. Blackburn*  
*Circuit Clerk*

1. Alford, Ann B., Baldwin Times, Bay Minette
2. Allen, James B., Jr., Farmer, Lillian P1
3. Ballard, Lloyd J., Merchant, Bay Minette
4. Becker, Earl V., Mailman, Bay Minette
5. Becker, Ina H., Bookkeeper, Bay Minette
6. Page, Cornelia B., Housewife, Bay Minette P3
7. Lewis, Glen M., Salesman, Fairhope
8. Keenan, Jean D., Housewife, Fairhope
9. Malbis, George, Garage Operator, Spanish Fort
10. Melton, Estelle, Housewife, Spanish Fort D6
11. Nelson, Clarence A., Merchant, Fairhope
12. Blackwell, Earl, Merchant, Foley P2
13. Brantley, Doris Stuart, Housewife, Bay Minette
14. Lipscomb, Edward, Farmer, Foley
15. Teem, Keeneth, Linesman, Foley
16. Pumphrey, Rex, Vulcan Signs, Foley P4
17. Reda, Gus F., Farmer, Silverhill
18. Ryan, Dorothy L., Housewife, Bay Minette
19. Stallworth, F. W., Painter, Summerdale D3
20. Strong, Charles W., Jr., Merchant, Bay Minette D1
21. Tenison, Ralph Bruce, Monuments, Bay Minette
22. Chestang, Pichan, D., Brookley Field, Bay Minette
23. Coleman, Daisy Nell, Vanity Hair, Perdido
24. Coleman, Maynard, Civil Service, Perdido
25. Cooper, Claude, Farmer, Rosinton
26. Russell M. Crawford, Electrician, Bay Minette
27. Deal, Harold L., State Of Alabama, Foley
28. Deason, E. L., Retired, Foley
29. Henry, J. W., Salesman, Fairhope
30. Hocutt, William B., Office Work, Fairhope D4
31. Holman, Walter C., Printer, Fairhope
32. Huett, James S., Retired Fairhope
33. Irvin, E. L. Farmer, Foley P6
34. Thames, Grady, Farmer Robertsdale P5
35. Tunstall, Solomon, Laborer, Stockton
36. Brown, Hilard, Bay Minette, Alabama
37. Woodson, G. W., Retired, Bay Minette, Alabama D2
38. Bishop, Bobby Jean, Bookkeeper, Bay Minette, Alabama D5
39. Lipscomb, Lawrence, Farmer, Foley, Alabama

Foley tractor  
w.  
Flowers

Change -

P-XXXXX X

D-XXXXX X

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9216