

STATEMENT

LAW OFFICE OF

FOREST A. CHRISTIAN

Hon. Telfair Mashburn
Judge, Circuit Court
Bay Minette, Alabama

P. O. DRAWER 190
FOLEY, ALABAMA 36535

March 1, 1971

Fairhope Title & Survey Co., Inc.
vs: Kary S. Bullard # 9246

Dear Judge:

"Not found", so please non-suit.


Forest A. Christian

SUMMONS

STATE OF ALABAMA,)

COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons KARY S. BULLARD, 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, Alabama, at the place of holding same by FAIRHOPE TITLE & SURVEY COMPANY, INC.

Witness my hand this the 6 day of May, 1970.

Alice J. Duck
Clerk

** ** *

COMPLAINT

FAIRHOPE TITLE & SURVEY
COMPANY, INC.,

PLAINTIFF,

VS:

KARY S. BULLARD,

DEFENDANT.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The Plaintiff claims of the Defendant THREE HUNDRED EIGHTY-FOUR & 00/100 DOLLARS (\$384.00), due from him by account on, to wit: the 9th day of May, 1967, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant THREE HUNDRED EIGHTY-FOUR & 00/100 DOLLARS (\$384.00), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 9th day of May, 1967, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant THREE HUNDRED EIGHTY-FOUR & 00/100 DOLLARS (\$384.00), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 9th day of May, 1967, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 27th day of April, 1970.

Forest A. Christian
Forest A. Christian, Attorney
for Plaintiff

Defendant's address:

Foley, Alabama

MAY 6 1970

ALICE J. DUCK

CLERK
REGISTER

FAIRHOPE TITLE & SURVEY CO., INC.

ENGINEER
CLAUDE W. ARNOLD
PRESIDENT

P. O. BOX 502
FAIRHOPE, ALABAMA 36532
DIAN STITT ARNOLD
SECRETARY
TELEPHONE 928-9163

ABSTRACTORS
J. H. ARNOLD
GRACE A. KING
VICE PRESIDENT

April 27, 1970

STATEMENT OF AC COUNT: Everliner Bullard and Kary S
Bullard.

Statement rendered May 9, 1967.....

Everliner Bullard
% Kary S. Bullard
Foley, Alabama..

-TO- Perimeter Survey, Percolation Tests, and Pr-
liminary Subdivision Plat of "Bullards Subdivision"
in the E $\frac{1}{2}$ of the NW $\frac{1}{4}$ of the NW $\frac{1}{4}$ of Section 34, T7S,
R4E, Baldwin County, Alabama.

Charges in full to date \$384.00

ABSTRACTS OF TITLE - LAND SURVEYING - ENGINEERING ASSISTANCE

STATE OF ALABAMA,
COUNTY OF BALDWIN.

Before me, the undersigned Notary Public, in and for said County, in said State, personally appeared C. W. ARNOLD, who being first duly sworn, deposes and says that he is President of FAIRHOPE TITLE & SURVEY COMPANY, INC., which is a Corporation.

That as such President, affiant has knowledge of the account owed to FAIRHOPE TITLE & SURVEY COMPANY, INC., by Everline Ballard and Gary S. Ballard, who ~~is~~ ^{are} individuals.

That the attached itemized statement is a true and correct statement of the account owed by Everline Ballard and Gary S. Ballard to FAIRHOPE TITLE & SURVEY COMPANY, INC.,

That there is now owing by Everline Ballard and Gary S. Ballard the sum of Three hundred eighty four and ^{no} 100 DOLLARS, with interest from the Ninth day of May, 1967, after allowing all credits.

Claude W. Arnold
Affiant

Subscribed and sworn to before me
this the 27th day of April,
1970

Rudolph E. Tinsley
Notary Public, State at Large,
State of Alabama.....

My Commission Expires June 14, 1973

No. 91246

SUMMONS

STATE OF ALABAMA,)

COUNTY OF BALDWIN.)

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COMPLAINT

FAIRHOPE TITLE & SURVEY	X	
COMPANY, INC.,	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:	X	AT LAW
KARY S. BULLARD,	X	9246
DEFENDANT.	X	

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Forest A. Christian
Forest A. Christian, Attorney
for Plaintiff

Defendant's address:

Foley, Alabama

FILED

MAY 6 1970

ALICE J. DUCK

CLERK
REGISTER

VOL 65 PAGE 547

FAIRHOPE TITLE & SURVEY CO., INC.

ENGINEER
CLAUDE W. ARNOLD
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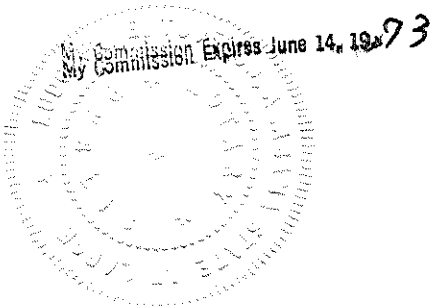
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Claude W. Arnold
Affiant

Subscribed and sworn to before me
this the 27th day of April,
1970

Rudolph E. Thurston
Notary Public, State at Large,
State of Alabama.....



no. 9246

SUMMONS AND COMPLAINT

FAIRHOPE TITLE & SURVEY COMPANY,
INC.,

PLAINTIFF,

VS:

KARY S. BULLARD,

DEFENDANT.

FILED

MAY 6 1970

ALICE J. DUCK

CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN

(205) 943-2201

P. O. DRAWER 190

FOLEY, ALABAMA 36535

Noted 7 day of May 1970
Not found in any county and diligent search and in-
quiry.

By D. S. Wilkins
Taylor Wilkins, Sheriff
Deputy Sheriff

Received 6 day of May 1970
and on day of May 1970
I served a copy of the within on Kary S. Bullard
By service on _____
TAYLOR WILKINS, Sheriff
By _____ D. S.

He is in the custody of the