

ESTATE OF H. C. JORDAN,
Deceased, by the Merchants National
Bank, Trust Department, as the
Executor/Trustee of said Estate,

Plaintiff,

vs

HERBERT WASHINGTON FUQUA

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9958

COUNT ONE

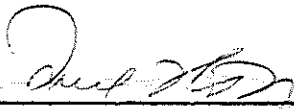
The Plaintiff claims of the Defendant the sum of One Hundred Eighteen & 50/100, (\$ 118.50), DOLLARS, due from him for work and labor done for the Defendant by the Plaintiff on to-wit October 9, 1970, at his or her request, which sum of money with the interest thereon is still unpaid.

An itemized statement of account, verified by the Affidavit of a competent witness is attached hereto and made a part hereof as Plaintiff's Exhibit "A".

COUNT TWO

The Plaintiff claims of the Defendant the sum of One Hundred Eighteen & 50/100, (\$ 118.50), DOLLARS, due from him by account on to-wit October 9, 1970, which sum of money with the interest thereon is still unpaid.

An itemized statement of account, verified by the Affidavit of a competent witness is attached hereto and made a part hereof as Plaintiff's Exhibit "A".



FRED F. SMITH, JR.

Attorney for the Plaintiff

P.O. Box 487
Fairhope, Alabama

SERVICE OF PROCESS may be
had on the Defendant at:

Box 284
Loxley, Alabama

Employed at Alabama DryDock & Shipbuilding
Mobile, Alabama

FILED

AUG 2 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

COUNTY OF MOBILE

STATE OF ALABAMA

Be it remembered, that on this 11 day of June
A. D., 1971, personally appeared before me, the undersigned authority,
Walter I. Cleverdon known to me

who being duly sworn, upon his oath stated that he is Assistant Trust Officer
of The Merchants National Bank of Mobile

{ a corporation organized and doing business under the laws of the State of _____
{ and has been duly authorized by said corporation to make this affidavit
{ a partnership composed of _____

~~a sole trader doing business as~~ Executor/Trustee of H.C. Jordan, Deceased, Estate
and that as such he makes this affidavit; that he is familiar with the books and business of
said Merchants National Bank; that the attached account against

HERBERT WASHINGTON FUQUA of P. O. Box 284, Loxley, Alabama 36551
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
posing the said account were sold and delivered to said HERBERT WASHINGTON FUQUA

at { its
their } special instance and request, that credit has been duly given for all payments and
his

just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of ONE HUNDRED EIGHTEEN AND 50/100 Dollars
(\$ 118.50) with interest from to-wit October 9 1970 is justly due and
remains unpaid.

The Merchants National Bank of Mobile
as Executor/Trustee X

I hereby certify under my official seal that I am authorized as a Notary Public to By
administer oaths under the laws of the State of Alabama
and that the foregoing was subscribed and sworn to before me on the day and year
first above stated:

Assistant Trust Officer

Madeline Marie Baucum

Notary Public

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 9958

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ...HERBERT WASHINGTON FUQUA.....

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.....

HERBERT WASHINGTON FUQUA Defendant.....

by ESTATE OF H. C. JORDAN, Deceased, by the Merchants National Bank, Trust Department

.....as the Executor/Trustee of said Estate..... Plaintiff.....

Witness my hand this.....2nd.....day of.....August..... 1971...

Eunice B. Blackman Clerk

No. 9958

Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ESTATE OF H. C. JORDAN, Deceased

Plaintiffs

vs.

HERBERT WASHINGTON FUQUA
650-813243-84458 Defendants
Behind Pr. JAMES on O.K.

SUMMONS AND COMPLAINT

Filed Aug. 2, 1971

Eunice B. Blackmon Clerk

AUG 04 1971

Fred F. Smith, Jr.
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Loxley, Ala

Received In Office

August 4 1971

Sheriff

I have executed this summons

this 17th of May 1971

by leaving a copy with

Herbert W. Fuqua

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY Fred Seibert
DEPUTY SHERIFF

Taylor Wilkins, Sheriff

Fred Seibert Deputy Sheriff

F. Seibert

Estate of H. C. Jordan,)
Deceased, et al.)
Plaintiff)
vs)
Herbert Washington Fuqua)
Defendant)

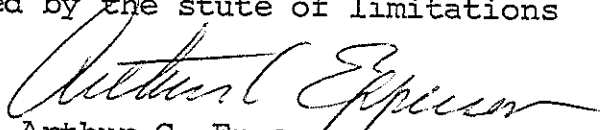
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

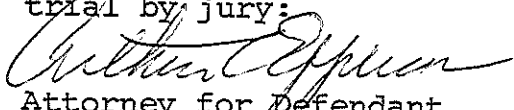
Case # 9958

Comes the defendant in the above styled cause and for plea to the complaint and each count thereof assigns separately and severally to each count the following separate and several pleas, to-wit:

1. Not guilty.
2. The Count has been paid before this action was begun.
3. The action is barred by the stute of limitations


Arthur C. Epperson
Attorney for the Defendant

The Defendant demands a
trial by jury:


Attorney for Defendant

FILED

SEP 23 1971

EUNICE B. BLACKMON CIRCUIT
CLERK