

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

Plaintiff,

vs

DEWEY GODWIN

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9959

COUNT ONE

The Plaintiff claims of the Defendant the sum of Ninety-four
& 00/100, (\$94.00), DOLLARS, due from him
for work and labor done for the Defendant by the Plaintiff on
to-wit July 29, 1969, 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 Ninety-four
& 00/100, (\$94.00), DOLLARS, due from him
by account on to-wit July 29, 1969, 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 565
Robertsdale, 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 _____

~~as a corporation organized and 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

DEWEY GODWIN of P. O. Box 565, Robertsedale, Ala. 36567
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 DEWEY GODWIN

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 NINETY-FOUR AND NO/100 Dollars
(\$ 94.00) with interest from to-wit July 29 1969 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
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.

By [Signature]
Assistant Trust Officer

Madeline Marie Bacon
Notary Public

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 9959

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon DEWEY GODWIN

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.....

DEWEY GODWIN, 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...

Ernie B. Blackmon Clerk

R-Dale

No. 9959.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ESTATE OF H. C. JORDAN, Deceased

Plaintiffs

vs.

DEWEY GODWIN

Defendants

SUMMONS AND COMPLAINT

Filed Aug. 2, 1971

Eunice B. Blackmon Clerk

AUG 04 1971

TAYLOR WILKINS
SHERIFF

Fred F. Smith, Jr.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robertsdale, Ala

Received In Office

August 4 1971

Sheriff

I have executed this summons

this Aug. 13 1971
by leaving a copy with

Dewey Godwin

Sheriff claims 50 miles at
Terr. Cents. per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff

BY Deputy Sheriff

Taylor Wilkins Sheriff

Hall Deputy Sheriff

Soni R.T.
R-Dale

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

Plaintiff

VS.

DEWEY GODWIN

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9959

Comes now the Defendant in the above styled cause and
files his answers to the Plaintiffs Bill of Complaint:

1.

The Defendant for answer to the Complaint, saith that
the account is barred by the Statute of Limitations of three
years.

2.

The Defendant avers that the allegations of the Complaint
are untrue.

WILTERS, BRANTLEY & NESBIT

BY:

Thurley S. Nesbit
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 23 day of August
1971, served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By:

Thurley S. Nesbit

FILED

AUG 23 1971

EUNICE B. BLACKMON CIRCUIT
CLERK