

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 9961

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOHN R. GREGGS, SR.

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

JOHN R. GREGGS, SR., 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. Blackburn, Clerk

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

Plaintiff,

vs

JOHN R. GREGGS, SR.

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9961

COUNT ONE

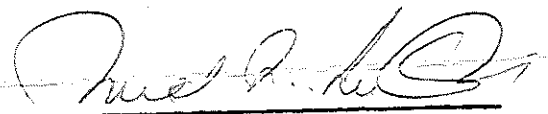
The Plaintiff claims of the Defendant the sum of SIX HUNDRED FORTY-SIX & 70/100, (\$ 646.70), DOLLARS, due from him for work and labor done for the Defendant by the Plaintiff on to-wit December 13, 1969, at his or her request, which sum of money with the interest thereon is still unpaid.

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 SIX HUNDRED FORTY-SIX & 70/100, (\$ 646.70), DOLLARS, due from him by account on to-wit December 13, 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  
302 DeLaMare  
Fairhope, Alabama

SERVICE OF PROCESS may be  
had on the Defendant at:  
Route 1 Box 104  
Silverhill, Alabama 36576

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., 19 71, 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 \_\_\_\_\_

~~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  
JOHN R. GREGGS, SR. of Route 1, Box 104, Silverhill, Alabama  
is just and correct, within the knowledge of this affiant, that the items thereon stated and com- 36576  
posing the said account were sold and delivered to said JOHN R. GREGGS, SR.

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 SIX HUNDRED FORTY-SIX AND 70/100 Dollars  
(\$ 646.70) with interest from to-wit December 13 19 69 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.

W. I. Cleverdon  
Assistant Trust Officer

Madeline Marie Bacon

Notary Public

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

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IN THE CIRCUIT COURT OF  
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AT LAW

CASE NO. 9961

COUNT ONE

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Silverhill, Alabama 36576

  
FRED F. SMITH, JR.  
Attorney for the Plaintiff  
302 DeLaMare  
Fairhope, Alabama

FILED

AUG 2 1971

EUNICE B. BLACKMON  
CIRCUIT  
CLERK

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a sole trader doing business as Executor/Trustee of H.C. Jordan, Deceased, Estate  
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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 [Signature]  
administer oaths under the laws of the State of Alabama Assistant Trust Officer  
and that the foregoing was subscribed and sworn to before me on the day and year  
first above stated.

Madeline Marie Baucom

Notary Public

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 9961

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JOHN R. GREGGS, SR. 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. Blalock Clerk

*S. Hill*  
No. 9961

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ESTATE OF H. C. JORDAN, Deceased

Plaintiffs

vs.

JOHN R. GREGGS, SR.

Defendants

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

*Silverhill, Ala*

Received In Office

*August 4* 1971

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

*John R. Gregg, Sr.  
Recalled by order  
of Circuit Clerk  
12-16-71*

Sheriff claims \_\_\_\_\_ miles at

Ten Cents per mile Total \$ \_\_\_\_\_  
TAYLOR WILKINS, Sheriff

BY \_\_\_\_\_ DEPUTY SHERIFF

Sheriff

Deputy Sheriff