

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  
MARTIN L. NELSON of 313 White Avenue, Fairhope, Ala. 36532  
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 MARTIN L. NELSON

at { its } special instance and request, that credit has been duly given for all payments and  
{ their }  
{ his }  
just and lawful offsets to which said account is entitled as thereon stated, and that the balance  
thereof, amounting to the sum of TWO HUNDRED TWENTY-FOUR AND NO/100 Dollars  
(\$ 224.00) with interest from to-wit November 19 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.

Walter I. Cleverdon  
Assistant Trust Officer

Madeline Marie Baucum

Notary Public

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

Plaintiff,

vs

DALTON JONES

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9964

COUNT ONE

The Plaintiff claims of the Defendant the sum of Seventy-One  
& 15/100, (\$ 71.15), DOLLARS, due from him  
for work and labor done for the Defendant by the Plaintiff on  
to-wit January 9, 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 Seventy-One  
& 15/100, (\$ 71.15), DOLLARS, due from him  
by account on to-wit January 9, 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".

SERVICE OF PROCESS may be  
had on the Defendant at:

Route 1 Box 121  
Fairhope, Alabama

  
FRED F. SMITH, JR.

Attorney for the Plaintiff  
P.O. Box 487  
Fairhope, 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

{ 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  
DALTON JONES of Route 1, Box 121, Fairhope, Ala. 36532  
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 DALTON JONES

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 SEVENTY-ONE AND 15/100 Dollars  
(\$ 71.15) with interest from to-wit January 9 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 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. 9964

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon DALTON JONES

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.....

DALTON JONES, 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 19. 71

*Emice B. Blackman*, Clerk

No. 9964

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ESTATE OF H. C. JORDAN, Deceased

Plaintiffs

vs.

DALTON JONES

Rt. 1 Box 121  
Fairhope

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

Fairhope, Ala.

Received In Office

August 4 1971

Sheriff

I have executed this summons

this 6th / Aug 1971

by leaving a copy with

Dalton Jones

Sheriff claims 70 miles at 7.00

Ten Cents per mile Total \$

TAYLOR WILKINS, Sheriff

BY Fred Seibert DEPUTY SHERIFF

Taylor Wilkins

Sheriff

Fred Seibert

Deputy Sheriff

Richie Park

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

Plaintiff, )

vs. )

DALTON JONES, )

Defendant. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9964

DEMURRER

Comes now the Defendant in the above styled cause, and demurs to the Bill of Complaint filed herein, and for grounds thereof assigns the following separately and severally:

1. That said Bill of Complaint fails to state a cause of action.
2. That said Bill of Complaint fails to attach an itemized statement as stated in the Bill of Complaint.

  
ATTORNEY FOR DEFENDANT

**FILED**

SEP 9 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 7 day of September, 1971

  
Attorney for Defendant

THE UNITED STATES OF AMERICA  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

WATER RESOURCES DIVISION  
NATIONAL CENTER FOR WATER RESEARCH  
WASHINGTON, D. C. 20004

1980-1981

1980-1981

1980-1981

1980-1981

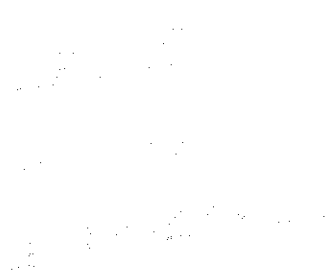
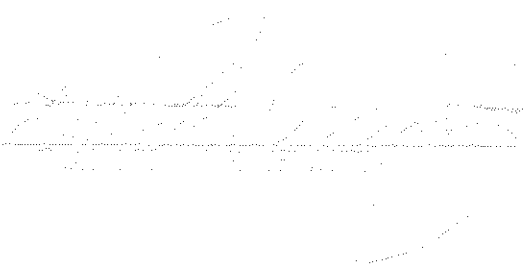
1980-1981

THE UNITED STATES OF AMERICA  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

WATER RESOURCES DIVISION  
NATIONAL CENTER FOR WATER RESEARCH  
WASHINGTON, D. C. 20004

THE UNITED STATES OF AMERICA  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

WATER RESOURCES DIVISION  
NATIONAL CENTER FOR WATER RESEARCH  
WASHINGTON, D. C. 20004



WATER RESOURCES DIVISION  
NATIONAL CENTER FOR WATER RESEARCH  
WASHINGTON, D. C. 20004

9964

# MEMO-LETTER

JOHN V. DUCK  
Attorney at Law  
P. O. DRAWER Y - FAIRHOPE, ALABAMA

## MESSAGE

## REPLY

TO Mrs. Eunice Blackmon  
Bay Minette, Ala.

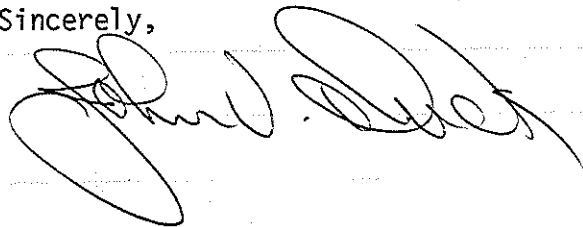
DATE September 7, 1971

Re: H. C. Jordan Estate vs. Dalton Jones  
Civil Case No. 9964

Dear Mrs. Blackmon:

Enclosed please find Demurrer to be filed in  
captioned case.

Sincerely,



SIGNED

SIGNED