

BAILEY & TAYLOR
ATTORNEYS AT LAW
61 NORTH SECTION STREET
P. O. BOX 361
FAIRHOPE, ALABAMA 36532

AUGUST 13, 1971

MRS. EUNICE BLACKMON
CLERK OF CIRCUIT COURT
BAY MINETTE, ALABAMA, 36507

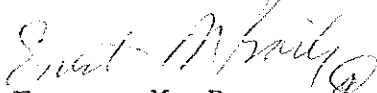
RE: ESTATE OF H. C. JORDAN
VS. CLIFFORD D. TAYLOR
AT LAW # 9965

DEAR EUNICE:

I WILL APPRECIATE YOU FILING THE ENCLOSED
PLEA IN THE ABOVE CASE. I HAVE FORWARDED
A COPY OF SAME TO FRED SMITH, THE ATTORNEY
FOR THE PLAINTIFF.

THANKING YOU FOR YOUR ASSISTANCE IN THIS
MATTER, I AM

VERY TRULY YOURS,


ERNEST M. BAILEY

EMB/w

INCL: AS NOTED

ESTATE OF H. C. JORDAN
DECEASED, BY THE MERCHANTS NATIONAL
BANK, TRUST DEPARTMENT, AS THE
EXECUTOR/TRUSTEE OF SAID ESTATE,

PLAINTIFF,

VS

CLIFFORD D. TAYLOR,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO: 9965

PLEA

COMES NOW THE DEFENDANT IN THE ABOVE STYLED CAUSE AND
FOR ANSWER TO THE BILL OF COMPLAINT, AND TO EACH COUNT THEREOF,
SAYS;

1. NOT GUILTY.

2. THE CAUSE IN THIS ACTION IS BARRED BY THE STATUTE
OF LIMITATION OF THREE YEARS PURSUANT TO TITLE 7, SEC. 24, CODE
OF ALABAMA, AS RECOMPILED IN 1958.

BAILEY & TAYLOR

By: Charles M. Bailey

FOR THE TRIAL OF THIS CAUSE
THE DEFENDANT DEMANDS A TRIAL BY JURY.

Charles M. Bailey

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 13th day of August 1971
served a copy of the foregoing on Frederick Smith Petty
By mailing the same by United States Mail, Properly addressed, and First
Class Postage Prepaid.

BAILEY & TAYLOR

By: Charles M. Bailey

FILED

AUG 13 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

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

Plaintiff,

vs

CLIFFORD D. TAYLOR

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

At Law

CASE NO. 9965

COUNT ONE

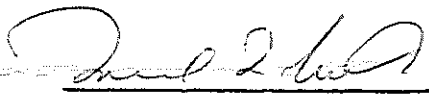
The Plaintiff claims of the Defendant the sum of Four Hundred
Forty-three & 00/100, (\$ 443.00), DOLLARS, due from him
for work and labor done for the Defendant by the Plaintiff on
to-wit March 11, 1967, at his or her request, which sum
of money with the interest thereon is still unpaid.

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 Four Hundred
Forty-three & 00/100, (\$ 443.00), DOLLARS, due from him
by account on to-wit March 11, 1967, 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:

Trione
Daphne, Alabama (P.O.Box 95)

FILED

AUG 2 1971

EUNICE B. BLACKMON CIRCUIT
CLERK