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
Be it remembered, that on this 11 day of June Be it remembered, that on this 11 day of June
water and the state of the stat
who being duly sworn lipon his oath stated that he is the same and the
who being duly sworn, upon his oath stated that he is
(a comparation organized and doing business under the laws of the State of
and has been duly authorized by said corporation to
a sole trader doing business as Executor/Trustee of H.C. Jordan, Deceased, Estate
The makes this efficient that he is tarnible with the books and business of
and that as such he makes this anidavit, that he is remarks; that the attached account against said Merchants National Bank; that the attached account against CLIFFORD D. TAYLOR of P. O. Box 95, Daphne, Alabama 36526
CLIFFORD D. TAYLOR of S. O. Box 93, Debition record and com-
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
is just and correct, within the knowledge of this amant, that the items thereon seeds and posing the said account were sold and delivered to said CLIFFORD D. TAYLOR
at { its } special instance and request, that credit has been duly given for all payments and
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his his
just and lawful offsets to which said account is entitled as thereon stated, and that the balance thereof, amounting to the sum of FOUR HUNDRED FORTY-THREE AND NO/100 Dollars thereof, amounting to the sum of toward March 11 10 67 is justly due and
thereof, amounting to the sum of FOOR HONDIGHT 1957 is justly due and (\$ 443.00) with interest from to-wit March 11 19 67 is justly due and
remains unpaid. The Merchants National Bank of Mostly as Executor/Trustee
I hereby certify under my official seal that I am authorized as a Notary Public toBy Assistant Trust Officer administer oaths under the laws of the State of Alabama Assistant Trust Officer
administer oaths under the laws of the State of and sworn to before me on the day and year
and that the foregoing was subscribed and sworn to before the state of

Notary Public

STAT	E OF	ALABAMA	Circuit Court, Baldwin County
2000 2000 2000 2000	Baldwi	n County	No9965
			TERM, 19
			TO ANY SHERIFF OF THE STATE OF ALABAMA:
You Are I	- - - - - - - - - - - - - - - - - - -	ommanded to Sum	mon CLIFFORD D. TAYLOR
	1		
to appear	r and p	lead, answer or de	mur, within thirty days from the service hereof, to the complaint
filed in th	e Circuit	Court of Baldwin C	County, State of Alabama, at Bay Minette, against
(CLIFFOR	D D. TAYLOR	Defendant
by	Estate	of H. C. Jordan	n, Deceased, by the Merchants National Bank, Trust
	Departm	ent, as the Exc	ecutor/Trustee.ofsaid.Estate
Witness r	ny hand	this2nd	day of

Plaintiffs Vs. CLIFFORD D. TAYLOR Yo Through All Complaints SUMMONS AND COMPLAINT Filed AUG. 2. 19.71. Eunice B. Blackmon Clerk Sheriff claims inites at TAYLOR WILKINS Sheriff Plaintiff's Attorney Fred F. Smith, Jr. Plaintiff's Attorney I have executed this summons this	No9965 Page	Section 1 to 1
Baldwin County CIRCUIT COURT ESTATE OF H. G. JORDAN, Deceased Plaintiffs Vs. CLIFFORD D. TAYLOR Sheriff Line executed this summons this Line for the county of the first of the county of th	STATE OF ALARAMA	Defendant lives at
ESTATE OF H. C. JORDAN, Deceased Plaintiffs Plaintiffs Vs. GLIFFORD D. TAYLOR Yo THOMES SUMMONS AND COMPLAINT Filed AUG. 2, 19.71. Eunice B. Blackmon Clerk Sheriff claims TAYLOR TOTAL OF THE COMPLAINT Fired F. Smith, Jr. Plaintiff's Attorney Plaintiff's Attorney Plaintiff's Attorney 19.7. I have executed this summons this & 2		Dophne, ala
Plaintiffs Plaintiffs Vs. CLIFFORD D. TAYLOR Yo Thouse The love of the summons Summons And Complaint Filed Aug. 2. 19.71. Eunice B. Blackmon Clerk Sheriff claims TAYLOR WILKINS, Sheriff	CIRCUIT COURT	
Plaintiffs vs. CLIFFORD D. TAYLOR Jo Thomas And Complaint SUMMONS AND COMPLAINT Filed AUG. 2. 19.71. Eunice B. Blackmon Clerk Sheriff claims inlies of TAYLOR WILKINS, Sheriff TAYLOR WILKINS, Sheriff Fred F. Smith, Jr. Plaintiff's Attorney Plaintiff's Attorney Plaintiff's Attorney Taylor Wilkins, Sheriff Ta	ESTATE OF H. C. JORDAN, Deceased	19.7.1. Sheriff
by leaving a copy with CLIFFORD D. TAYLOR JOHNE SERVICE Defendants SUMMONS AND COMPLAINT Filed AUG. 2. 19.71. Eunice B. Blackmon Clerk Sheriff claims Trylor Wilking Sheriff Fred F. Smith, Jr. Plaintiff's Attorney by leaving a copy with August Copy with	Plaintiffs	
GLIFFORD D. TAYLOR YO THOME THE DEFENDANT PORT OF STANDARD SUMMONS AND COMPLAINT Filed AUG. 2. 19.71. Eunice B. Blackmon Clerk Sheriff claims in lies at TAYLOR WILKINS, Sheriff SHERIFF Fred F. Smith, Jr. Plaintiff's Attorney Plaintiff's Attorney Plaintiff's Attorney CLUMOLD Jacks AUG. 2. 19.71. Sheriff claims in lies at TAYLOR WILKINS, Sheriff TAYLOR WILKINS, Sheriff Sheriff claims in lies at TAYLOR WILKINS, Sheriff TAYLOR WILKINS, Sheriff Sheriff claims in lies at TAYLOR WILKINS, Sheriff TAYLOR WILKINS, Sheriff Sheriff claims in lies at TAYLOR WILKINS, Sheriff TAYLOR WILKINS, Sheriff Sheriff claims in lies at TAYLOR WILKINS, Sheriff TAYLOR WILKINS, Sheriff TAYLOR WILKINS, Sheriff Sheriff claims in lies at TAYLOR WILKINS, Sheriff TAYLOR WILKINS, Sher	vs,	
SUMMONS AND COMPLAINT SUMMONS AND COMPLAINT Filed AUG. 2. 19.71. Eunice B. Blackmon Clerk Sheriff claims finites of TAYLOR WILKINS, Sheriff TAYLOR WILKINS, Sheriff Fred F. Smith, Jr. Plaintiff's Attorney Aug. Aug. Aug. Aug. Sheriff Taylor Aug. Sheriff		by leaving a copy with
Filed AUG. 2. 19.71. Eunice B. Blackmon Clerk Sheriff claims miles at Taylor Wilkins, Sheriff Taylor Wilkins, Sheriff Taylor Wilkins, Sheriff Taylor Sheriff Taylor Sheriff		Clifford D. Jacylo.
Eunice B. Blackmon Clerk Sheriff-claims inites at Interpret Sheriff Claims inites at Interpret Sheriff Claims inites at Interpret Interpret Interpret Sheriff	SUMMONS AND COMPLAINT	
Sheriff claims miles at Ten Cents per mile Total \$ TAYLOR WILKINS, Sheriff BY	Filed AUG. 2. 19.71.	
Ten Cents per mile Total \$ 5.70 TAYLOR WILKINS, Sheriff Fred F. Smith, Jr. Plaintiff's Attorney Sheriff Taylor Wilkins, Sheriff Taylor Wilki	Eunice B. Blackmon Clerk	
Fred F. Smith, Jr. Plaintiff's Attorney Taylor Wilking, Mentiff Plaintiff's Attorney Taylor Wilking, Mentiff Taylor Wilking, Mentiff Author Sheriff		Too Conte per mile Total \$ 5.40
Fred F. Smith, Jr. Plaintiff's Attorney Plaintiff's Attorney Plaintiff's Attorney		TAYLOR WILKINS, Shering
Fred F. Smith, Jr. Plaintiff's Attorney Taylor Welkin Sherif	AUG 0 4 1971	Spart Dollser
Plaintiff's Attorney / aylor Welkin, Sherif	for this party of the control of the	
Plaintiff's Attorney / aylor Welkin, Sherif	Fred F. Smith, Jr.	1 20 1
I liter	***************************************	aylor Wilkin Sheriff
Defendant's Attorney/	Defendant's Attorney	Ful Super Deputy Sheriff

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ESTATE OF <u>H.C.JORDAN</u> ,	I	IN THE CIRCUIT COURT OF
Deceased, by the Mercharts National		
Bank, Trust Department, as the	ì	BALDWIN COUNTY, ALABAMA
Executor/Trustee of said Estate,		!
	ğ	
Plaintiff,		
	Ī	•
vs		At Law
	ş	
ARCHIE J. SINCLAIR		
MOITH D & DINOMITE	I	0011
Defendant.		CASE NO. 9966

COUNT ONE

The Plaintiff claims of the Defendant the sum of Three Hundred Nineteen & 82/100 , (\$ 319.82), DOLLARS, due from him for work and labor done for the Defendant by the Plaintiff on to-wit July 28, 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 <u>Three Hundred Nineteen & 82/100</u>, (\$319.82), DOLLARS, due from him by account on to-wit <u>July 28, 1969</u>, 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

FILED

AUG 2 1971

EUNICE B. BLACKMON CINCUIT

SERVICE OF PROCESS may be had on the Defendant at:

Box 281 Loxley, Alabama

COUNTY OF MOBILE
STATE OF ALABAMA
Be it remembered, that on thisllday ofJune A. D., 19.71, personally appeared before me, the undersigned authority,known to me who being duly sworn, upon his oath stated that he isAssistant 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
also letter desired by the state 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 ARCHIE J. SINCLAIR of P. O. Box 281, Loxley, Alabama 36551 is just and correct, within the knowledge of this affiant, that the items thereon stated and composing the said account were sold and delivered to said. ARCHIE J. SINCLAIR 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 THREE HUNDRED NINETEEN AND 82/100 Dollars (\$ 319.82) with interest from to-wit July 28 19.69 is justly due and remains unpaid. The Merchants National Bank of Mobil as Executor/Irustee X
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
Madeline Mane Burer Notary Public

STAT	TE.	0F	ALABAMA)		Circuit	t Court, Ba	ddwin (County	
6.	Bale	dwin	County	}	No99	66	•••••		-/	
• • • • • • • • • • • • • • • • • •	*	*			~-	٠		**********	TERM,	19
				TO ANY	HERIFF	OF TH	E STATE	OF AI	_ABAM	A:
You Are	Hereb	у Сог	mmanded to Sum	mon ARCHIE	J. SIN	CLAIR				
- 1 - 1	· 			,				***********		
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			ad, answer or de ourt of Baldwin C							
ARCHIE	E.Ja.	SINC	LAIR				•••••	•••••	, Defen	dant
oy ESTA	ATE C	FH.	C. JORDAN, D	eceased by	the Me	rchants	Nationa	l Bank	, Trust	Departm
as t	the I	Execu	tor/ Trustee	of said Es	tate				Plai	ntiff
Witness v	my h	and th	nis2nd	day of	August			1	971.	· · · · · · · · · · · · · · · · · · ·
vv italess 1	inth syc	AIIQ U			6/1	riel	s B. 7	Gla	. km	Q. Clerk

Joseph .	
No. 9966 Page	
STATE OF ALABAMA Baldwin County	Defendant lives at
CIRCUIT COURT	Received In Office
ESTATE OF H. C. JORDAN, Deceased	August 4 19 7/
Plaintiffs	I have executed this summons
vs. ARCHIE J. SINCLAIR Defendants	this 19 by leaving a copy with Archie J. Simolaus
SUMMONS AND COMPLAINT	
Filed Aug. 2, 19.71	
Eunice B. Blackmon Clerk	Sheriff claims // miles at
	Ten Cents per mile Total \$ 4.00 TAYLOR WILKINS; Sheriff DEPUTY SHERIFF
AUG 0 4 1971	
Fred F. Smith, Jr.	
Plaintiff's Attorney	Jay low Wilken Sheriff
Defendant's Attorney	Taylor Wilker Sheriff 12 213 vous Deputy Sheriff
	46 mi RT Sofly

ESTATE OF H. C. JORDAN, DECEASED,
By: The Merchants National Bank,
Trust Department, as the Executor—
Trustee of said Estate,

Plaintiff,

vs

ARCHIE J. SINCLAIR,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

BALDWIN COUNTY, ALABAMA

Case No. 9966

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned authority in and for said County in said State, this day personally appeared Archie J. Sinclair, who first being by me duly sworn, under oath, deposes and says: That my name is Arthie J. Sinclair and am named as Defendant in the above styled cause,

I, the said Archie J. Sinclair, denies on information and belief, the full account sued on and further denies any liability for any part of the account which is the subject of this suit.

This affidavit is made pursuant to the provision of Title 7, Section 378, Code of Alabama, Recompiled 1958, as amended.

Dated this the _____ day of August, 1971.

Michig Sinchian

Archie J. Sinclair

Sworn to and subscribed before me on this the $\frac{19}{100}$ day of August, 1971.

Notary Rublic

My Commission Expires:

CERTIFICATE OF SERVICE

I, the undersigned, certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to Fred F. Smith, Jr., Attorney for the Plaintiff, P. O. Box 487, Fairhope, Alabama, by U. S. Mail, postage Prepaid, properly addressed, on thie the day of August, 1971.

Attorney for the Defendant

AUG 19 1971