

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

CLIFFORD D. TAYLOR of P. O. Box 95, Daphne, Alabama 36526
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 CLIFFORD D. TAYLOR

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 FOUR HUNDRED FORTY-THREE AND NO/100 Dollars
(\$ 443.00) with interest from to-wit March 11 19 67 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 Bacon
Notary Public

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 9965

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CLIFFORD D. TAYLOR

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.....

CLIFFORD D. TAYLOR 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. Blackman Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ESTATE OF H. C. JORDAN, Deceased

Plaintiffs

vs.

CLIFFORD D. TAYLOR

90 TRONES LEFT 31 Defendants
 DAPHNE DEPARTMENT POST
 SUMMONS AND COMPLAINT
 225 W. 11540

Filed AUG. 2, 1971.

Eunice B. Blackmon Clerk

AUG 04 1971

FRED F. SMITH, JR.

Fred F. Smith, Jr.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Daphne, Ala

Received In Office

August 4 1971

Sheriff

I have executed this summons

this 6th of Aug 1971

by leaving a copy with

Clifford D. Taylor

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

BY

Fred Seibert

DEPUTY SHERIFF

Taylor Wilkins

Sheriff

Fred Seibert

Deputy Sheriff

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

At Law

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 Three Hundred Nineteen & 82/100, (\$ 319.82), DOLLARS, due from him by account on to-wit July 28, 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:

Box 281
Loxley, 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
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 com-
posing the said account were sold and delivered to said ARCHIE J. SINCLAIR

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 THREE HUNDRED NINETEEN AND 82/100 Dollars
(\$ 319.82) with interest from to-wit July 28 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.

Walter I. Cleverdon
Assistant Trust Officer

Madeline Marie Bauson

Notary Public

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 9966

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ARCHIE J. SINCLAIR

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.....

ARCHIE J. SINCLAIR..... 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.

Emilio B. Blackman Clerk

No. 9966

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ESTATE OF H. C. JORDAN, Deceased

Plaintiffs

vs.

ARCHIE J. SINCLAIR

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

Loxley, Ala.

Received In Office

August 4 1971

Sheriff

I have executed this summons

this 8/4 1971

by leaving a copy with

Archie J. Sinclair

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins

Sheriff

WFB your

Deputy Sheriff

46 mi RT
Loxley

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
)
) AT LAW
)
)
) 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 19 day of August, 1971.

Archie J. Sinclair
Archie J. Sinclair

Sworn to and subscribed before me on this the 19 day of August, 1971.

John P. Beebe
Notary Public

My Commission Expires: June 14 - 1975

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 this the 19 day of August, 1971.

FILED

AUG 19 1971

John P. Beebe
Attorney for the Defendant