

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

Plaintiff,

vs

GABRIEL GLENN BOYKIN

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

At Law

CASE NO. 10,081

COUNT ONE


The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SIX & 00/100, (\$ 406.00), DOLLARS, due from him for work and labor done for the Defendant by the Plaintiff on to-wit January 12, 1970, 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 SIX & 00/100, (\$ 406.00), DOLLARS, due from him by account on to-wit January 12, 1970, 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 36532

SERVICE OF PROCESS may be
had on the Defendant at:
Route 1, Box 258-C
Robertsdale, Alabama

FILED

OCT 21 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

COUNTY OF Mobile

STATE OF Alabama

Be it remembered, that on this 21st day of June
A. D., 1971, personally appeared before me, the undersigned authority, R. Melvin Moseley known to me

who being duly sworn, upon his oath stated that he is a Trust Officer
of The Merchants National Bank of Mobile

{ a corporation organized and doing business under the laws of the State of Alabama
{ and has been duly authorized by said corporation to make this affidavit
{ a partnership composed of _____

~~as a corporation organized and doing business as~~ Executor/Trustee of H.C. Jordan, 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
Gabriel Glenn Boykin of Route 1, Box 258-C, Robertsdale, Alabama
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 Gabriel Glenn Boykin

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 SIX AND no/100 Dollars
(\$ 406.00) with interest from to-wit January 12, 1970 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
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.

Stewart Thomas Jr.
Notary Public

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonGabriel Glenn Boykin.....

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.....

.....Gabriel Glenn Boykin....., Defendant.....

byEstate of H.C.Jordan, Deceased, by the Merchants National Bank,.....

Trust Department, as the Executor/Trustee of said Estate
....., Plaintiff.....

Witness my hand this.....21.....day of.....Oct..... 19.....21.....

Eunice B. Blackman, Clerk

No. 10,081

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

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

Plaintiffs

vs.

Gabriel Glenn Boykin
Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

Clerk

OCT 21 1971

EUNICE B. BLACKMON CIRCUIT CLERK

Fred F. Smith, Jr., Fairhope, Ala.
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Route 1, Box 258-C
Robertsdale, Alabama

Received In Office

OCT 21 1971 19.....

Sheriff

I have executed this summons

this 11-4 1971

by leaving a copy with

GABRIEL Glenn Boykin

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY Brown DEPUTY SHERIFF

Taylor Wilkins Sheriff

HJB 2000 Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

50 mi RT.
R Dali