

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

Plaintiff,

vs

LOUIS STANLEY WHITTEN, SR.,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,083

COUNT ONE

The Plaintiff claims of the Defendant the sum of One Hundred Eighty & 59/100, (\$ 180.59), DOLLARS, due from him for work and labor done for the Defendant by the Plaintiff on to-wit September 29, 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 One Hundred Eighty & 59/100, (\$ 180.59), DOLLARS, due from him by account on to-wit September 29, 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".



FRED F. SMITH, JR.

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

SERVICE OF PROCESS may be  
had on the Defendant at:

FILED

OCT 21 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

105 Fels Avenue  
Fairhope, Alabama  
or  
Sherwood Forest  
Fairhope, Alabama

COUNTY OF MOBILE

STATE OF ALABAMA

Be it remembered, that on this 11 day of June  
A. D., 19 71, 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

~~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  
LOUIS STANLEY WHITTEN, SR. of 105 Fels 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 LOUIS STANLEY WHITTEN, SR.

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 ONE HUNDRED EIGHTY AND 59/100 Dollars  
(\$ 180.59) with interest from to-wit September 29 1969 is justly due and  
remains unpaid.

The Merchants National Bank of Mobile  
as Executor/Trustee X

By W. I. Cleverdon  
Assistant Trust Officer

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.

Madeline Marie Baucum

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 Summon Louis Stanley Whitten, Sr.

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.....

..... Louis Stanley Whitten, Sr. .... Defendant.....

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

Witness my hand this 5/ day of Oct. 19 71

Eunice B. Blackman, Clerk

No. 10,083.

Page.....

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

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

*wrong name person*  
Louis Stanley Whitten, Sr.  
*Stanley Jordan* Defendants  
**SUMMONS AND COMPLAINT**

Filed ..... 19.....

..... Clerk

**FILED**

OCT 21 1971

EUNICE B. BLACKMON  
CIRCUIT CLERK

.....  
Plaintiff's Attorney

.....  
Defendant's Attorney

Defendant lives at  
105 Fels Ave., Fairhope, Ala.  
or Sherwood Forest, Fairhope,  
Ala.

Recieved In Office

..... OCT 21 1971 ..... 19.....

..... TAYLOR WILKINS ..... Sheriff  
I have executed this summons

this ..... 19.....  
by leaving a copy with

*Louis Stanley Whitten, Sr.*

Shawnee-claims..... miles at

Ten cents per mile Total \$.....

TAYLOR WILKINS, Sheriff.....

BY..... DEPUTY SHERIFF.....

....., Sheriff

..... Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

*W.C. Good, 114-71*

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

Plaintiff,

vs

LOUIS STANLEY WHITTEN, SR.,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,183

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The Plaintiff claims of the Defendant the sum of One Hundred Eighty & 59/100, (\$ 180.59), DOLLARS, due from him for work and labor done for the Defendant by the Plaintiff on to-wit September 29, 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 One Hundred Eighty & 59/100, (\$ 180.59), DOLLARS, due from him by account on to-wit September 29, 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".

  
FRED F. SMITH, JR.

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

SERVICE OF PROCESS may be  
had on the Defendant at:

105 Fels Avenue  
Fairhope, Alabama  
or  
Sherwood Forest  
Fairhope, Alabama

FILED

OCT 21 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK



COUNTY OF MOBILE

STATE OF ALABAMA

Be it remembered, that on this 11 day of June  
A. D., 19 71, 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  
LOUIS STANLEY WHITTEN, SR. of 105 Fels 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 LOUIS STANLEY WHITTEN, SR.

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 ONE HUNDRED EIGHTY AND 59/100 Dollars  
(\$180.59) with interest from to-wit September 29 1969 is justly due and  
remains unpaid.

The Merchants National Bank of Mobile  
as Executor/Trustee

By [Signature] Assistant Trust Officer

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.

Madeline Marie Bacon

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 Summon .....Louis Stanley Whitten, Sr.....

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.....

..... Defendant.....  
Louis Stanley Whitten, Sr.

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

Witness my hand this.....21.....day of.....Oct..... 1921.....

Emmie B. Blackmon, Clerk



No.....

Page.....

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

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

vs.

*LOUIS STANLEY WHITTON*

Louis Stanley Whitten, Sr.  
Defendants

**SUMMONS AND COMPLAINT**

Filed ..... 19.....

..... Clerk

.....  
Plaintiff's Attorney

.....  
Defendant's Attorney

Defendant lives at

105 Fels Ave., Fairhope, Ala.  
or Sherwood Forest, Fairhope,  
Ala.

Received In Office

..... 19.....

..... Sheriff

I have executed this summons

this ..... 19.....

by leaving a copy with

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..... Sheriff

..... Deputy Sheriff