

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

Plaintiff,

vs

JOHN HADLEY, SR.

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,084

COUNT ONE

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FORTY-EIGHT & 00/100, (\$ 148.00), DOLLARS, due from him for work and labor done for the Defendant by the Plaintiff on to-wit April 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 FORTY-EIGHT & 00/100, (\$ 148.00), DOLLARS, due from him by account on to-wit April 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 36532

SERVICE OF PROCESS may be  
had on the Defendant at:

Robertsdale, Alabama

FILED

OCT 21 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

STATE OF ALABAMA

Walter I. Cleverdon  
who being duly sworn, upon his oath stated that he is Assistant Trust Officer  
of The Merchants National Bank of Mobile  
and is engaged in said business under the laws of the State of

of The Merchants National Bank of \_\_\_\_\_  
 { 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 \_\_\_\_\_

~~as a trading business~~ 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 General Delivery, Robertsdale, Alab

and that as shown on the attached account against said Merchants National Bank; that the attached account against JOHN HADLEY, SR. of General Delivery, Robertsdale, Alabama

JOHN HADLEY, SR. of General Delivery, Res. 36567  
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 JOHN HADLEY, SR.

at { its  
their  
his } special instance and request, that credit has been duly given for all payments and

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 FORTY-EIGHT AND NO/100 Dollars (\$ 148.00) with interest from to-wit April 29, 1969 is justly due and remains unpaid. The Merchants National Bank of  
as Executor/Trustee X

The Merchants National Bank of Mobile  
as Executory 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.

By [Signature]  
Assistant Trust Officer

first above stated.  
Madeline Marie Saucom  
 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 .....John Hadley, 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 ~~him~~.....

.....John Hadley, Sr. .... 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.....21.....day of.....Oct.....19.21.....

*Eunice B. Blackmon*, Clerk

No. 10,084

Page.....

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

**CIRCUIT COURT**

Estate of H.C. Jordan, Deceased,  
by the Merchants National Bank  
Trust Department, Plaintiffs

vs.

John Hadley, Sr.  
Robertsdale, Ala. 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

Robertsdale, Alabama  
(Wife: Matilda E. Hadley)

Received In Office

OCT 21 1971 19.....

TAYLOR WILKINS Sheriff  
SHERIFF

I have executed this summons

this 22 Oct 1971

by leaving a copy with

John Hadley, Sr.

Sheriff's claim 50 miles at  
Ten Cents per mile Total \$ 5.00  
TAYLOR WILKINS, Sheriff  
DEPUTY SHERIFF

Taylor Wilkins Sheriff  
W. J. B. Town Deputy Sheriff

Moore Printing Co. Bay Minette, Ala.

50 mi R.T.  
R. Dale