

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

Plaintiff,

vs

WILLIE FARMER

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,185

COUNT ONE

The Plaintiff claims of the Defendant the sum of Three Hundred  
& 00/100, (\$ 300.00), DOLLARS, due from him  
for work and labor done for the Defendant by the Plaintiff on  
to-wit October 11, 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  
& 00/100, (\$ 300.00), DOLLARS, due from him  
by account on to-wit October 11, 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:

Johnson's Corner (Wife:Arlene)  
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  
WILLIE FARMER of General Delivery, Fairhope, Alabama  
is just and correct, within the knowledge of this affiant, that the items thereon stated and com- 36532  
posing the said account were sold and delivered to said WILLIE FARMER

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 AND NO/100 Dollars  
(\$ 300.00) with interest from to-wit October 11 19 69 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

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 .....Willie Farmer.....

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.....

Willie Farmer, ..... 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 1921

Eunice B. Blackmer Clerk

No. 10,085

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.

Willie Farmer

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  
Johnson's Corner, Fairhope, Ala.  
(wife: Arlene Farmer)

Received In Office

OCT 21 1971

TAYLOR WILKINS

SHERIFF

19.....

Sheriff

I have executed this summons

this 23 Oct 1971

by leaving a copy with

WILLIE FARMER

Sheriff claims 70 miles

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY W. Crook  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. Crook Deputy Sheriff