

SUMMONS

STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA

You are hereby commanded to summon RODNEY CARVER, ROUTE 1, BOX 162, FAIRHOPE, ALABAMA, to appear within thirty days after the service of this summons in the Circuit Court to be held for said County, then and there to demur or plead to the complaint of Jerry Hance.

Witness my hand this 12 day of April, 1972

Eunice B. Blackmon  
CLERK

\* \* \* \* \*

JERRY HANCE, d/b/a )

MAGNOLIA SPRINGS GARAGE )

vs. )

RODNEY CARVER )

Defendant )

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 10,346

COMPLAINT

The Plaintiff Jerry Hance, d/b/a Magnolia Springs Garage claims of the Defendant One Hundred Sixty-Five and 59/100ths Dollars, due from the Defendant by account from the 20th day of September, 1969, which sum of money with interest thereon is still unpaid.

An itemized account, verified by the affidavit of a competent witness shall be used in evidence on the trial of the causes and said account is filed with the complaint at the time of filing.

Daniel E. Robison  
Daniel E. Robison  
Attorney at Law

FILED

APR 12 1972

EUNICE B. BLACKMON  
CIRCUIT  
CLERK

Received 13 day of April 1972  
and on 18 day of April 1972  
I serve a copy of the within  
on Rodney Carver

By service on Rodney Carver

TAYLOR WILKINS, Sheriff  
E. G. Geyer D.E.

Ray 1/23

~~7.00 Miles at  
Ten Cents per mile for  
TAYLOR WILKINS, Sheriff  
\$8.50  
\$7.00  
\$1.50~~

Seventy miles (70 mi)  
A. J. Geyer

10,346 9

Kerry Hame, d/b/a  
Magnolia Springs  
Garage \*

vs: \*  
Rodney Carver \*  
At. 1 \*  
Box 162 \*  
Hope, Al. \*

W. T. Williams  
FILED  
on 6.27

APR 12 1972

EUNICE B. BLACKMON CIRCUIT CLERK

APR 13 1972

Samuel E. Robinson

STATE OF ALABAMA )

BALDWIN COUNTY )

VERIFICATION OF ACCOUNT

Before me, the undersigned authority on this day personally appeared JERRY HANCE known to me, who being by me duly sworn states on oath that the foregoing and annexed account in favor of Jerry Hance d/b/a Magnolia against Springs Garage RODNEY CARVER for the sum of \$165.59

is within the knowledge of affiant, just and true; that it is due and unpaid and that all lawful offsets, payments and credits have been allowed.

Jerry Hance  
Affiant

Subscribed and sworn to before me this . 9 . day of  
April . . . . . 19 . .

Daniel E. Robinson  
Notary Public

My Commission Expires  
January 28, 1975

SHEET NO. \_\_\_\_\_

ACCOUNT NO. \_\_\_\_\_

RATING \_\_\_\_\_

NAME \_\_\_\_\_

CREDIT LIMIT \_\_\_\_\_

ADDRESS \_\_\_\_\_

TERMS \_\_\_\_\_

MADE IN U.S.A.

FORM  
NI-D

DATE

ITEMS

FOLIO

DEBITS

CREDITS

BALANCE

9-20

#7578 \$765.19 Less \$100.00 cash

R28

16559

6/10 17/20  
16559

Balance  
DUE

2/28

Interest

248

3/31

Subtotal

252

255.17314

6/10

4/30

R41

Ext. Bureau  
3/18/71

0  
0

IRBY AND POGGI  
ATTORNEYS AT LAW  
305 NORTH SECTION STREET  
FAIRHOPE, ALABAMA 36532

SAMUEL W. IRBY  
FRANCIS A. POGGI, JR.

MAILING ADDRESS  
P. O. DRAWER 8  
TELEPHONE 926-8285  
AREA CODE 205

February 1, 1973

Eunice B. Blackmon  
P. O. Box 239  
Bay Minette, Alabama 36507

Dear Eunice:

As you know, Dan Robison is no longer practicing law in this area. Please place Irby and Poggi as attorneys of record on the following cases that were turned over to us by Dan.

Dr. D. K. Cooper -vs- J. Wade	Case No. 10,156✓
Farmers & Merchants Bank -vs- Clifford McLain & Louise McLain	Case No. 10,366
Donald Gaar, d/b/a/ Foley Auto Parts -vs- Jaye Truck Lines, Inc.	Case No. 10,346
Jerry Hance, d/b/a/ Magnolia Springs Garage -vs- Laura Williams	Case No. 10,348
Kenneth Totsch, d/b/a/ Totsch Boat Works -vs- Donald Forsyth	Case No. 10,132✓
Jerry Hance, d/b/a/ Magnolia Springs Garage -vs- Ralph Dubuison	Case. No. 10,349
Baptist Hospital -vs- Fannie Mae Walden	Case No. 10,373✓
La Rue Flying Service, Inc. -vs- John R. Childress	Case No. 9,469✓

FILED

FEB 2 1973

EUNICE B. BLACKMON CIRCUIT  
CLERK

Eunice B. Blackmon  
February 1, 1973  
Page 2

Jerry Hance, d/b/a/ Magnolia Springs  
Garage -vs- Rodney Carver

Case No. 10,346

George W. Markham, Sr. and Randall  
Markham, d/b/a/ George Markham &  
Sons Signs -vs- H. Rowland Clifton

Case No. 10,458

Foley Tractor Co., Inc -vs- Paul L.  
Bonnell

Case No. 9,215

La Rue Flying Service -vs- Henry King

Case No. 9,615

Eddie Sweat -vs- John A. McDuffie

Case No. 9,455

If you have any questions concerning this matter, please do  
not hesitate to call.

Yours very truly,

*Sam W. Libby*  
For the Firm

SWI/akb

FILED

FEB 2 1973

EUNICE B. BLACKMON CIRCUIT  
CLERK

Daniel E. Robison

P. O. Box 794  
PHONE 943-4955

ATTORNEY AT LAW

117 So. Alston Street  
FOLEY, ALABAMA 36535

---

Clerk of the Court  
Circuit Court, at Law  
Bay Minette, Alabama

Re: Hance v. Carver  
# 10,346  
Civil, Non-Jury

Dear Eunice

Please submit this file to Judge Mashburn for Default Judgment.

The Defendant was served on April 18 and has not filed an answer.

The amount of default judgment is computed thusly:

Principal	\$165.59
6% int. since	
Sept. 20, 1969	<u>24.84</u>
Total	\$190.43

Very truly yours

  
Daniel E. Robison