

GEORGE W. MARKHAM, SR. and
RANDALL MARKHAM, doing business
as GEORGE MARKHAM & SONS SIGNS,

Plaintiffs,

vs.

H. ROWLAND CLIFTON,

Defendant

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§

§

§

§

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,458

COUNT ONE

Plaintiffs claim of Defendant the sum of TWO HUNDRED SEVENTY-FIVE AND 60/100 (\$275.00) DOLLARS due from Defendant by account on, to-wit, the 8th day of July, 1971 which sum of money, with interest thereon, is still due and unpaid. This suit is filed on an itemized statement of the account, verified by the affidavit of a competent witness, which is attached to the original complaint and made a part hereof.

FEIBELMAN & SILVER
Attorneys for Plaintiffs

By.

Daniel C. Robinson
OF COUNSEL

Defendant may be served at Crimson Tiki Restaurant, Gulf Shores, Alabama after 4:00 P.M.

FILED

JUN 21 1972

EUNICE B. BLACKMON

CIRCUIT
CLERK

STATE OF Florida:

COUNTY OF Escambia:

Before me, the undersigned authority in and for said State and County, personally appeared Randall G. Markham, who, being known to me and being by me first duly sworn, did depose and say on oath:

That he/she is the Partner of George Markham and Sons and as such is authorized to make this affidavit; that he/she is familiar with the books and records of said Partnership and that the attached statement of account is true, valid and correct, as reflected upon the books and records of said claimant; that the balance shown to be due thereon is due and unpaid; that the affiant has actual and personal knowledge of the correctness of said account; and that the books, records and accounts of claimant are kept and maintained under the supervision and control of the undersigned.

Randall G. Markham
Affiant

Sworn and subscribed to before me on this the 14 day of June, 19 72.

Catherine C. Jones
Notary Public State of Florida at Large
My Commission exp. 4-16-75
City of Pensacola County, of Escambia

[SEAL]

My Commission Expires: 4-16-75

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

}

Circuit Court, Baldwin County

No. 10,458

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonH. ROWLAND CLIFTON.....

.....
.....
.....

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.....

.....H. ROWLAND CLIFTON....., Defendant.....

byGEORGE W. MARKHAM, SR. & RANDALL MARKHAM, doing business as GEORGE MARKHAM & SONS SIGNS.....

....., Plaintiff.....

Witness my hand this.....21st.....day of.....June.....19...72

Emmie B. Blackman....., Clerk

No. 10,458

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

GEORGE W. MARKHAM, SR. & RANDALL

MARKHAM, doing business as GEORGE MARKHAM
& SONS SIGNS
Plaintiffs

vs.

H. ROWLAND CLIFTON

Defendants

SUMMONS AND COMPLAINT

Filed June 21, 1972

Eunice B. Blackmon
Clerk

JUN 21 1972

JAY
SHERIFF

Daniel E. Robison

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

JUN 21 1972

TAYLOR WILKINS
SHERIFF

19.....

Sheriff

I have executed this summons

this July 7, 1972
by leaving a copy with

H. Rowland Clifton

Sheriff claims 100 miles of

Ten Cents per mile Total \$20.00

TAYLOR WILKINS, Sheriff

BY R. Long
DEPUTY SHERIFF

Sheriff

R. Long
Deputy Sheriff

GEORGE W. MARKHAM, SR. and
RANDALL MARKHAM, doing business
as GEORGE MARKHAM & SONS SIGNS,

Plaintiffs,

VS.

H. ROWLAND CLIFTON,

Defendant.

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
)

) AT LAW
)

) CASE NO. 10,458
)
)
)
)
)

Comes now the Defendant in the above styled cause and files this his Answer to said Bill of Complaint in each and every count thereof as follows:

1. Not guilty.

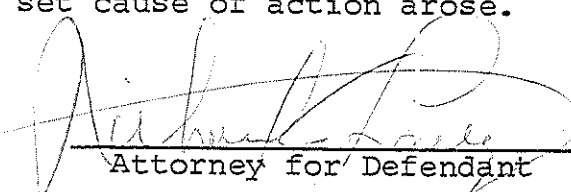
2. General issue.

3. The Defendant is not guilty of the matters alleged in said Bill of Complaint.

4. The Defendant, on the 8th day of July, 1971, denies that he had authorized any work of any type whatsoever to be done by the Plaintiff for or on behalf of the Defendant.

5. Defendant avers that the account as set forth in said Bill of Complaint was incurred by either Norman N. Coles or the Friendship House, Inc. which the Defendant had no interest in at the time said cause of action set forth in said Bill of Complaint arose.

6. Defendant avers that he was not presented with a statement of account by the Plaintiff on the date set forth in said Bill of Complaint and was not made aware of any indebtedness to the Plaintiff by Defendant at the alleged time set cause of action arose.

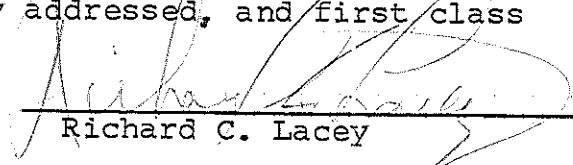

Attorney for Defendant

Defendant respectfully demands trial by jury.


Attorney for Defendant

MAILING CERTIFICATE

I do hereby certify that I have on this 14th day of July, 1972, served a copy of the foregoing Answer on counsel for the Plaintiff, Daniel E. Robison, Feibelman & Silver, by mailing the same by United States mail, properly addressed, and first class postage prepaid.


Richard C. Lacey

FILED

JUL 17 1972

EUNICE B. BLACKMON
CIRCUIT CLERK

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 B
TELEPHONE 928-8285
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

RICHARD C. LACEY

Attorney-At-Law

P. O. DRAWER A-J

FAIRHOPE, ALABAMA 36532

TELEPHONE 928-2373

July 17, 1973

Mrs. Eunice B. Blackmon
Clerk, Circuit Court
Baldwin County Court House
Bay Minette, Alabama 36507

Re: George W. Markham, Sr. et al vs. H. Rowland Clifton
Case No. 10,458

Dear Mrs. Blackmon:

Herewith our check in settlement of subject case in the
total amount of \$303.00--\$275.00 settlement plus \$28.00
court costs.

Sincerely,

Marcia Rydin

Secretary to Mr. Lacey

M. Rydin
Enclosure

cc: Irby & Poggi
Counsel for Plaintiff

To JUDGE MASHBURN
Please dismiss Circuit Court Case No. 10,458
as it has been settled by the parties.
Thanking you, I am

Very truly yours
Francis A. Poggi Jr.
IRBY AND POGGI

NAME

Mr. H. R. Clifton

ADDRESS

Foley Ala. 36535

1971

BUSINESS

INDIVIDUAL

TERMS

CREDIT LIMIT

RATING

DATE

ITEMS

EX

✓

DEBITS

CREDITS

BALANCE

ACCT. NO.

STREET NO.

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14-055

MADE IN U.S.A.

NATIONAL