

TELEPHONE  
AREA CODE 205  
897-2894

Jackson W. Stokes

ATTORNEY-AT-LAW

POST OFFICE BOX 356

Elba, Alabama 36323

July 13, 1972

Mrs. Eunice Blackman  
Circuit Clerk Baldwin County  
Court House  
Bay Minette, Alabama

10,497

Re: Custom Farm Services vs  
John Childress

Dear Miss Eunice:

Enclosed herewith is the original and one copy of a bill of complaint in the above matter. Please file into the Sheriff for service and advise me thereof.

Thanking you and with my regards, I am,

Sincerely,

*W. Stokes*

Jackson W. Stokes

JWS:fh

Enclosures

DALEVILLE OFFICE:  
STOKES & NOMBERG  
P. O. BOX 652  
DALEVILLE, ALABAMA 36322

TELEPHONE { 598-6261  
              { 598-6262

JACKSON W. STOKES  
JOEL M. NOMBERG

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons JOHN CHILDRESS, Route One, Box 33A, Loxley, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, within thirty (30) days from service hereof, and answer, plead or demur to the complaint of Custom Farm Services, Inc., a Delaware Corporation.

Witness my hand this 17<sup>th</sup> day of July, 1972.

Eunice B. Blackmon  
Clerk

CUSTOM FARM SERVICES, INC.,  
A Delaware Corporation,  
  
Plaintiff  
  
VS  
  
JOHN CHILDRESS,  
  
Defendant

\* IN THE CIRCUIT COURT OF  
\*  
\* BALDWIN COUNTY, ALABAMA  
\*  
\* AT LAW  
\*  
\* CASE NO. 10,497  
\*  
\*

Plaintiff claims of the defendant the sum of Four Thousand, Eight Hundred, Thirteen Dollars and Ninety-Seven Cents (\$4,813.97) due for goods merchandise and chattels sold to the defendant by the plaintiff from the 15th day of February, 1971 until, to-wit, the 8th day of October, 1971, which sum of money, together with interest thereon is due and unpaid.

Jasmm  
Attorney for the Plaintiff

I hereby acknowledge myself as security for cost in this cause.

Jasmm  
Attorney for the Plaintiff

FILED

JUL 17 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

# 10,497

Custom Farm Services,  
Inc. a Delaware Corp.

vs:

John Childress

FILED

JUL 17 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

RECEIVED

JUL 17 1972

TAYLOR WILKINS  
SHERIFF

Jackson W. Stokes

Received 18 July 1972  
and on 18 day of July 1972  
I served a copy of the writ of Sequestration  
on John Childress  
By service on Taylor Wilkins, Sheriff

Shorthand 270 Time 10  
Ten Cents per mile Total \$ 25.00  
TAYLOR WILKINS, Sheriff  
By James  
DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff  
H. H. H. H.  
50 miles  
Stokes

CUSTOM FARM SERVICES, INC., X  
A Delaware Corporation, X

Plaintiff

vs.

JOHN CHILDRESS,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,497

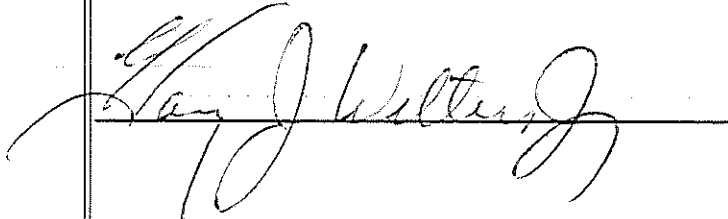
Comes now the Defendant in the above styled cause, and  
for answer to the Plaintiff's Complaint, and to each count thereof  
seperately and severally, says:

1. Not guilty.
2. Not guilty of the matters alleged therein.

WILTERS & BRANTLEY

BY: 

Defendant demands a trial  
by jury.



FILED

AUG 15, 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

CUSTOM FARM SERVICES, INC.  
A Delaware Corporation

Plaintiff

VS

JOHN CHILDRESS

Defendant

\* IN THE CIRCUIT COURT OF  
\*  
\* BALDWIN COUNTY, ALABAMA  
\*  
\* AT LAW  
\*  
\* CASE NO. 10497  
\*  
\*  
\*

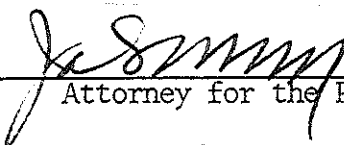
Comes now the Plaintiff in the foregoing styled cause and would amend his complaint as follows:

COUNT I.


Plaintiff claims of the Defendant the sum of Four Thousand, Eight Hundred, Thirteen Dollars and Ninety-Seven Cents (\$4,813.97) due for goods, merchandise and chattels sold to the Defendant by the Plaintiff from the 15th day of February, 1971 until, to-wit, the 8th day of October, 1971, which sum of money, together with interest thereon is due and unpaid.

COUNT II

Plaintiff claims of the Defendant the sum of \$4,813.97 due on an account between the Plaintiff and Defendant from February 15, 1971 until October 8, 1971, a verified copy of which is attached hereto and made a part hereof, which sum of money, together with interest thereon is due and unpaid.

  
Attorney for the Plaintiff

I hereby certify that I have this day mailed a copy of the foregoing amendment to Honorable Harry J. Wilters, Jr., Attorney for the Defendant at his proper mailing address in Bay Minette, Alabama, this 17th day of August, 1972.

  
Attorney for the Plaintiff

FILED

AUG 18 1972

EUNICE B. BLACKMON CIRCUIT CLERK

STATEMENT OF ACCOUNT  
John J. Childress

<u>DATE</u>	<u>INVOICE #</u>	<u>AMOUNT</u>	<u>PRODUCT</u>
2-15-71	488276	\$1345.52	lime, seed, tires, parts
3-25-71	568343	1286.25	fertilizer
6-17-71	568668	396.48	seed, insecticides, fungicides
7-2-71	568738	88.00	tires
8-13-71	568874	749.38	fertilizer, seed, herbicides, tires
8-20-71	568919	14.13	insecticides
9-23-71	568979	80.00	tires
10-08-71	569022	273.47	fertilizer
Total Invoices		4233.23	
Finance charges through 6-20-72		580.74	
Balance at 6-20-72		4813.97	

STATE OF ALABAMA  
COUNTY OF HOUSTON

I Cleon E. Sumner, District Credit Manager, do hereby certify that I have personal knowledge of the records of Custom Farm Services, Inc. and that the above account is true and correct and is past due and unpaid.

Cleon E. Sumner

Sworn to and subscribed before me this  
13 day of July 1972.

Donald R. Reice

NOTARY PUBLIC

EVOL

71 PAGE 82