

2328

BOOK 016 PAGE 198

SUMMONS

STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

You are hereby commanded to summon HILLIARD P. JENKINS, JOHN JENKINS, AND AMEILA JENKINS, d/b/a Jenkins Farms, 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, Alabama, at Bay Minette, against HILLIARD P. JENKINS, JOHN JENKINS AND AMEILA JENKINS, d/b/a Jenkins Farms, by the ALABAMA RESEARCH CHEMISTS INC.

Witness my hand this the 27<sup>th</sup> day of July, 1954.

Reice French  
Clerk

//////////

COMPLAINT

ALABAMA RESEARCH CHEMISTS INC. )  
Plaintiff )  
VS: )  
HILLARD P. JENKINS, JOHN JENKINS, )  
AND AMEILA JENKINS, d/b/a Jenkins Farms )  
Defendant )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COUNT I

The Plaintiff claims of the Defendants the sum of TWO THOUSAND TWO HUNDRED EIGHTY FIVE & 49/100 DOLLARS (\$2285.49), together with interest thereon, due from the Defendants by account on, to wit: the 24th day of July, 1954, which sum of money, with interest thereon is still unpaid.

COUNT II

The Plaintiff claims of the Defendants the sum of TWO THOUSAND TWO HUNDRED EIGHTY FIVE & 49/100 DOLLARS (\$2285.49), together with interest thereon, due from him on account stated between the Plaintiff and the Defendants on, to-wit: the 24th day of July, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT III

The Plaintiff claims of the Defendants the sum of TWO THOUSAND TWO HUNDRED EIGHTY FIVE & 49/100 DOLLARS (\$2285.49), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendants on, to wit: the 24th day of July 1954, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a Notary Public, which shows the amount due on this account as of the 24th day of July, 1954.

W. Lee Oliver  
Attorney for Plaintiff

# Alabama Research Chemists Inc.

MANUFACTURERS OF LIQUID FERTILIZER

Loxley, Alabama

STATEMENT OF ACCOUNT - JENKINS FARMS, H.P. JENKINS

		DEBIT	CREDIT	BALANCE
July 11, 1953	Sale #5131	\$ 234.00		\$ 234.00
Aug. 6, "	" #5105	58.50		292.50
" 15, "	Paid by Check		\$ 100.00	192.50
Sept. 2, "	Paid by Check		150.00	42.50
" 2, "	Spraying, Lovell's		24.00	18.50
" 14, "	Sale #5113	29.25		47.75
" 14, "	Sale #5114	585.00		632.75
Oct. 27, "	Spraying		8.00	624.75
Nov. 11, "	"		6.00	618.75
Dec. 22, "	Paid by Check		50.00	568.75
Jan. 14, 1954	Sale #5258	595.50		1164.25
" 14, "	" #5259	447.50		1611.75
" 18, "	" #5260	258.50		1870.25
Feb. 22, "	" #5261	350.75		2221.00
" 13, "	Paid by Chk.		40.00	2181.00
Jan. 12, "	" " "		450.00	1731.00
Feb. 22, "	" " "		117.24	1613.76
Mar. 10, "	Sale #5265	292.50		1906.26
" 10, "	Spraying		14.00	1892.26
" 20, "	Paid by Chk.		1000.00	892.26
" 12, "	Sale #5266	351.00		1243.26
" 17, "	" #5268	116.00		1359.26
" 19, "	" #5269	292.50		1651.76
" 21, "	" #5272	72.75		1724.51
" 23, "	" #5274	94.25		1818.76
" 24, "	" #5275	52.50		1871.26
" 30, "	" #5280	146.25		2017.51
APR. 2, "	" #5283	29.25		2046.76
" 30, "	Invoice #5167	779.75		2826.51
" 30, "	" #5167		523.40	2303.11
Mar. 24, "	Sale #5278	87.75		2390.86
May 13, "	Invoice #5169	390.00		2780.86
June 11, "	Invoice #5173 (Gas&Oil)		77.10	2703.76
" 24, "	Invoice #5178 (W.P. Jr. Acct.)		331.87	2371.89
* July 23, 1952	Sale #5268 (error)		1161.00	2255.89
Dec. 7, 1952	" #5123	10.70		2266.59
Dec. 15, 1953	" #5257	18.90		2285.49

ERROR)\*

I, Walter E. Petersen, Jr., for and in behalf of ALABAMA RESEARCH CHEMISTS INC. located at Loxley, Ala. being duly sworn, depose and say that the information listed above is true and correct, and represents all sales and payments or other credits.

Subscribed and sworn to, before me this 24 day of July 1954

*[Signature]*

Notary Public

*[Signature]*

Secy. & Treas.  
ALABAMA RESEARCH CHEMISTS INC.

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BOOK  
CABLE CODE A R C I

016 PAGE 208

AFFILIATED WITH  
DIXIE LABORATORIES INC.  
MOBILE, ALA.

*Alabama Research Chemist, Inc.*

MANUFACTURERS OF LIQUID FERTILIZER

*Loxley, Alabama*

INVOICE

No. 5167

Sold To Jenkins Farms

Loxley, Ala.

Date April

Terms \_\_\_\_\_

QUANTITY ORDERED Date	QUANTITY SHIPPED	ARTICLE	PRICE	AMOUNT
April 6	60	Gal. SURE-GROW Liquid Fertilizer	\$ 1.95	\$ 117.00
" 8	60	" " " "	"	117.00
" 13	90	" " " "	"	175.50
" 19	60	" " " "	"	117.00
" 20	60	" " " "	"	117.00
" 21				
" 22	15	" " " "	"	19.25
" 23	60	" " " "	"	117.00
	405 Gal.			\$ 779.75
<b>CREDITS</b>				
April 10		Returned 14 - 15 Gal. Drums @ \$ 1.50	\$ 21.00	
" 12		Paid on account	50.00	
" 20		Returned 4 * 15 gal. Drums @ 1.50	6.00	
" 23		Returned 4-30 gal. Drums @ 2.50	10.00	
		3-15 " " 1.50	4.50	
" 28		14 - 1 Gal. Bottles SURE-GROW @ 1.95	27.30	
" 30		46 bottles @ .10	4.60	
			\$ 123.40	
			400.00	
			\$ 523.40	\$ 523.40
May 1		Paid on account		
			Bal. Due	\$ 256.95

YOUR AGRICULTURAL AGENT PRESCRIBES—  
OUR LABORATORY FILLS HIS PRESCRIPTION ACCURATELY

ABLE CODE A R

BOOK

016 PAGE 210

AFFILIATED WITH

LABORATORIES INC.

MOBILE, ALA.

*Alabama Research Chemist, Inc.*

MANUFACTURERS OF LIQUID FERTILIZER

*Loxley, Alabama*

INVOICE

✓  
No

5169

Sold To

JENKINS FARMS

LOXLEY, ALA.

Date May 13, 1954

Terms

QUANTITY  
ORDERED

40

QUANTITY  
SHIPPED

40

ARTICLE

5 Gal. Cans SURE-GROW Liquid Fertilizer

PRICE

\$ 9.75

AMOUNT

\$ 390.00

YOUR AGRICULTURAL AGENT PRESCRIBES—  
OUR LABORATORY FILLS HIS PRESCRIPTION ACCURATELY

ALABAMA RESEARCH CHEMISTS,  
INC.,

Plaintiff,

vs.

HILLARD P. JENKINS, et al.,  
Individually and doing business  
as JENKINS FARMS,

Defendants.

I  
I  
I IN THE CIRCUIT COURT OF  
I BALDWIN COUNTY, ALABAMA  
I AT LAW.  
I  
I

Come now the Defendants in the above styled cause, by their attorneys, and demur to the complaint heretofore filed against them and to each count thereof, separately and severally, and assign the following separate and several grounds in support thereof:

1. That said complaint fails to state a cause of action.
2. That the allegations of Count I of said complaint are vague, indefinite and uncertain.
3. That the allegations of Count II of said complaint are vague, indefinite and uncertain.
4. That the allegations of Count III of said complaint are vague, indefinite and uncertain.
5. That the allegations of said complaint are vague, indefinite and uncertain.
6. That the amount claimed due is uncertain and cannot be ascertained from said complaint.

Respectfully submitted,

CHASON & STONE

By: M. Chason & S. Stone  
Attorneys for Defendants.

The Defendants respectfully ask that this cause be tried by a jury.

CHASON & STONE

By: M. Chason & S. Stone  
Attorneys for Defendants.

ALABAMA RESEARCH CHEMISTS,  
INC.,

Plaintiff,

vs.

HILLARD P. JENKINS, et al.,  
Individually and doing business  
as JENKINS FARMS,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW.

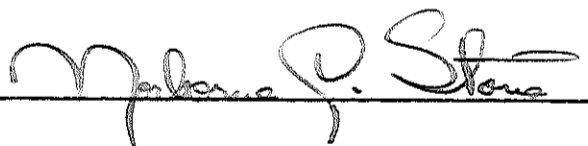
Come now the Defendants in the above styled cause by their attorneys and for answer to the complaint heretofore filed against them and to each count thereof separately and severally say as follows:

1. The allegations of the complaint are untrue.
2. The allegations of Count One are untrue.
3. The allegations of Count Two are untrue.
4. The allegations of Count Three are untrue.

Respectfully submitted,

CHASON & STONE

By:



2328

ALABAMA RESEARCH CHEMISTS, INC.,  
Plaintiff,

vs.

HILLARD P. JENKINS, et al.,  
Individually and doing business  
as JENKINS FARMS,  
Defendants..

\*\*\*\*\*  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW.

\*\*\*\*\*  
PLEAS

\*\*\*\*\*  
Filed 1-19-56  
Chief-Recorder  
Cecil

\*\*\*\*\*  
LAW OFFICES  
CHASON & STONE  
BAY MINETTE, ALABAMA

ALABAMA RESEARCH CHEMISTS, Inc.,

Plaintiff,

vs.

HILLARD P. JENKINS, et al.,  
Individually and doing business  
as JENKINS FARMS,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

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MOTION TO TRANSFER TO EQUITY

Comes now the Defendant Hillard P. Jenkins in the above styled cause by his attorneys and moves this Honorable Court to transfer the said cause from the Law Side of the Circuit Court of Baldwin County, Alabama, to the Equity Side of said Court and as grounds for the said motion says as follows:

That the cause of action upon which this suit is based arose out of the sale by the Plaintiff to the Defendant of a large quantity of fertilizer during the period of time from to-wit: July 11, 1953 to July 22, 1954. That the Plaintiff Corporation was incorporated June 11, 1953, and that the Defendant was a director in said corporation and is now a stockholder in said corporation as represented by Stock Certificates No. "FOUR" and "FIVE" for Forty-eight and three-fourths and One and one-fourth shares of stock in said corporation, respectively. That the consideration for the issuance of said stock to the Defendant, Hillard P. Jenkins, was the payment of Five Thousand Dollars (\$5,000.00) by him to said corporation under a subscription agreement and that since said incorporation and since the institution of this suit, the Defendant, Hillard P. Jenkins, is informed and believes and upon such information and belief alleges that all of the assets of said corporation have been sold, transferred, assigned or conveyed to Horace Kennedy. That the Defendant, Hillard P. Jenkins, has had no notice of any kind whatsoever of any stockholders' or directors' meeting to consider such a sale and that he is still the owner of stock in said corporation referred to above. That since said incorporation, and before the filing of this suit, he has received no audits or

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or accountings from said corporation nor has he ever received any dividends from said corporation. That he was the only subscriber to the capital stock of said corporation who complied with his subscription agreement and that no effort was ever made by said corporation to enforce such agreements as against the other subscribers, Walter E. Peterson, Jr., and Perry W. Hader, who had agreed to convey real property to said corporation and assign a chemical formula for the manufacture of fertilizer to said corporation, respectively, in consideration of the issuance to them of stock in said corporation. That as such stockholder he is entitled to an accounting and to an enforcement of his rights as a stockholder relative to the purported transfer of the assets of said corporation to the said Horace Kennedy and the Defendant, Hillard P. Jenkins, hereby claims his equitable right to such an accounting and an enforcement of his rights as a director and stockholder in the Plaintiff Corporation as a defense to the claim herein sued on.

Respectfully submitted,  
CHASON & STONE

By: Norborne C. Stone, Jr.

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STATE OF ALABAMA

BALDWIN COUNTY

Before me, Norborne C. Stone, Jr., a Notary Public, in and for said County in said State, personally appeared Hillard P. Jenkin, who is known to me, and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That his name is Hillard P. Jenkins and that he is one of the defendants in the above styled cause and that the facts alleged in the foregoing motion are true and that he believes that those facts which are alleged on information and belief to be true.

Dated this 9th day of March, 1956.

Hillard P. Jenkins

Sworn to and subscribed before

me this 9th day of March, 1956

M. C. Stone  
Notary Public, Baldwin County, Alabama

2328

ALABAMA RESEARCH CHEMISUS, INC.,

Plaintiff,

vs.

HILLARD P. JENKINS, et al.,  
Individually and doing business  
as JENKINS FARMS,

Defendants.

\*\*\*\*\*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

\*\*\*\*\*

MOTION TO TRANSFER TO EQUITY

\*\*\*\*\*

*not file*

FILED

MAY 13 1956

W. L. CHASON & STONE  
LAW OFFICES

CHASON & STONE  
BAY MINETTE, ALABAMA

AMENDED COMPLAINT

ALABAMA RESEARCH CHEMISTS, INC. )

PLAINTIFF )

VS: )

HILLIARD P. JENKINS, JOHN )  
JENKINS, AND AMELIA JENKINS, )  
doing business as JENKINS )  
FARMS, )

DEFENDANTS )

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendants TWO THOUSAND TWO HUNDRED EIGHTY FIVE & 49/100 DOLLARS (\$2,285.49), due from them by account on, to wit: the 24th day of July, 1954, which sum of money, with interest thereon, is still unpaid.

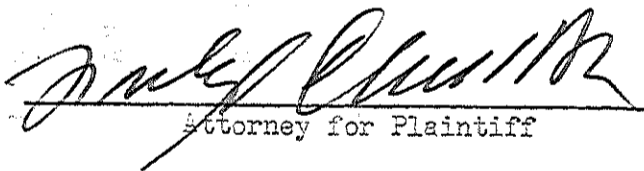
COUNT II:

The plaintiff claims of the defendants TWO THOUSAND TWO HUNDRED EIGHTY FIVE & 49/100 DOLLARS (\$2,285.49), due from them on account stated between the plaintiff and the defendants on, to wit: the 24th day of July, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendants TWO THOUSAND TWO HUNDRED EIGHTY FIVE & 49/100 DOLLARS (\$2,285.49), due from them for merchandise, goods and chattels sold by the plaintiff to the defendants on, to wit: the 24th day of July, 1954, which sum of money, with interest thereon, is still unpaid.

There is attached to the original complaint, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 24th day of July, 1954.

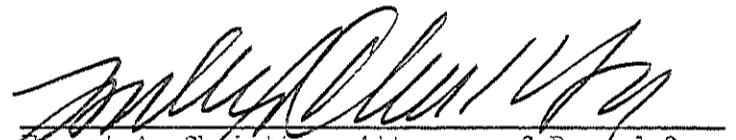
  
Attorney for Plaintiff

AFFIDAVIT ON JUDGMENT

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

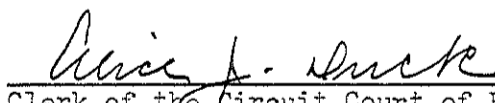
*Ala. Research Chemists, Inc.*  
*vs.*  
*Hilliard P. Jenkins et al*

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for said County, Forest A. Christian, who being duly sworn, deposes and saith that Alabama Research Chemists, Inc., at the March Term, 1956, of the Circuit Court of Baldwin County, Alabama, recovered a judgment against Hilliard P. Jenkins, John Jenkins and Amelia Jenkins, individually, doing business as Jenkins Farms, for the sum of TWO THOUSAND FIVE HUNDRED & 00/100 DOLLARS (\$2,500), plus interest from date of judgment, and the further sum of THIRTY ONE & 75/100 DOLLARS (\$31.75) costs of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment and that Fred Neumiller has or is believed to have in his possession or under his control, money or effects belonging to the defendants, or that he is or is believed to be indebted to the defendants, or is to be liable to them on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

  
Forest A. Christian, Attorney of Record for  
Alabama Research Chemists, Inc.

Sworn to and subscribed before me this the  
7th day of September, 1956.

*Filed 9-8-56*

  
Clerk of the Circuit Court of Baldwin  
County, Alabama

State of Alabama

BALDWIN COUNTY

TO Hilliard P. Jenkins, John Jenkins &amp; Amelia Jenkins, Defendant:

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of

Alabama Research Chemists Inc., Plaintiff,

versus Hilliard P. Jenkins, John Jenkins, &amp; Amelia Jenkins d/b/a/JENKINS FARM, Defendant,

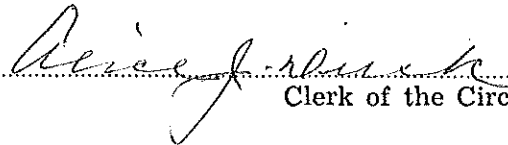
now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

FRED NEUMILLER

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 8th.

day of September, 1956.



Clerk of the Circuit Court.

125

Ex. Sept. 19, 1956

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

September 7, 1956

Mrs. Alice J. Duck  
Clerk of Court  
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed you will find an affidavit and writ on judgment in garnishment.

There is a case set for Friday wherein Amelia Jenkins et al. is suing Fred Neumiller, and I am anxious to attach any funds which Neumiller may owe Jenkins. I would also like to attach at once in case there is any settlement between the parties before the lawsuit. Neumillers live out of the state and I would suggest that you have the sheriff serve the local attorneys for Neumiller and would also like to get service in any other way that you are able. Maybe you could talk to some other attorney there to see if he has any other suggestions for service.

Yours very truly,

  
FOREST A. CHRISTIAN

WRIT ON JUDGMENT

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

Whereas Forest A. Christian has made affidavit as required by law that Alabama Research Chemists, Inc. at the March Term, 1956, of the Circuit Court of Baldwin County recovered a judgment against Hilliard P. Jenkins, John Jenkins and Amelia Jenkins, individually, and doing business as Jenkins Farms, for the sum of TWO THOUSAND FIVE HUNDRED & 00/100 DOLLARS (\$2,500), plus interest from date of judgment, and the further sum of THIRTY ONE & 75/100 DOLLARS (\$31.75) cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Fred Neumiller has, or is believed to have in his possession or under his control, money or effects belonging to the defendants, or that he is or is believed to be indebted to the defendants, or to be liable to them on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

These are therefore to command you, that you summon the said Fred Neumiller to be and appear at the next Term of Circuit Court of Baldwin County to be holden for said county, within thirty days after the service of this writ of garnishment, then and there to answer on oath, whether at the time of service of this writ, or at the time of making his answer, he has in his possession, or under his control any money or effects belonging to the defendants; and whether he is indebted to said defendants, or is liable to them on any contract for the payment of money or the delivery of personal property or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

Witness, Alice J. Duck, Clerk of said Court at office, this the 8th day of September, 1956.

Exp. 3-14-57

Alice J. Duck  
Clerk

# Alabama Research Chemist, Inc.

MANUFACTURERS OF LIQUID FERTILIZER

NO 5131

Coxley, Alabama

Sold To

Date

7/11/53

Street & No.

How Ship

Call for Bill

City & State

When Ship

Call for Bill

Quantity

Description

Price

Unit

Extension

1 GALLON LIQUID FERTILIZER @

5-GALLON CANS LIQUID FERTILIZER @

10-GALLON DRUMS LIQUID FERTILIZER @

4

30-GALLON DRUMS LIQUID FERTILIZER @

58.50

\$234.00

55-GALLON DRUMS LIQUID FERTILIZER @

EXTRA FOLDERS @

W. Perkins

Buyer

Salesman

Walter D. Stewart Jr.

Salesman

AFFILIATED WITH  
DIXIE LABORATORIES INC.  
MOBILE, ALA.*Alabama Research Chemist, Inc.*

MANUFACTURERS OF LIQUID FERTILIZER

*Loxley, Alabama*

INVOICE

No 5169

Sold To

*JENKINS FARMS**LOXLEY, ALA.*Date *May 18, 1954*

Terms

QUANTITY ORDERED	QUANTITY SHIPPED	ARTICLE	PRICE	AMOUNT
40	40	5 Gal. Cons SURE-GROW Liquid Fertilizer	\$ 9.75	\$ 390.00
YOUR AGRICULTURAL AGENT PRESCRIBES— OUR LABORATORY FILLS HIS PRESCRIPTION ACCURATELY				

AFFILIATED WITH  
DIXIE LABORATORIES INC.

MOBILE, ALA.

*Alabama Research Chemist, Inc.*

MANUFACTURERS OF LIQUID FERTILIZER

*Loxley, Alabama*N<sup>o</sup> 5173Sold To JENKINS FARMLOXLEY, ALA.Date JUNE 11, 1954

Terms \_\_\_\_\_

CREDIT SLIPQUANTITY  
ORDEREDQUANTITY  
SHIPPED

ARTICLE

PRICE

AMOUNT

FOR GASOLINE BILL IN FULL TO DATE

\$ 77.10

YOUR AGRICULTURAL AGENT PRESCRIBES—  
OUR LABORATORY FILLS HIS PRESCRIPTION ACCURATELY

CABLE CODE A R C I

INVOICE

AFFILIATED WITH  
DIXIE LABORATORIES INC.  
MOBILE, ALA.

*Alabama Research Chemist, Inc.*  
MANUFACTURERS OF LIQUID FERTILIZER  
*Loxley, Alabama*

Nº 5178

Sold To JENKINS FARMS  
LOXLEY, ALA.

Date JUNE 24, 1954

Terms \_\_\_\_\_

CREDIT SLIP

QUANTITY ORDERED	QUANTITY SHIPPED	ARTICLE	PRICE	AMOUNT
		PAYMENT IN FULL OF HAITER PETERSEN, JR'S. ACCOUNT AT JENKIN'S FARM STORE		\$ 331.87
<p>YOUR AGRICULTURAL AGENT PRESCRIBES— OUR LABORATORY FILLS HIS PRESCRIPTION ACCURATELY</p>				

## MANUFACTURERS OF LIQUID FERTILIZER

Nº 5257

JAN 19 1950 *Loxley, Alabama*

Sold To

Date \_\_\_\_\_

## How

Ship

When

Ship

Street &amp; No.

City &amp; State

[illegible]

Buyer

Salesman

Received 27 day of July 1954  
and on 31 day of July 1954  
I served a copy of the within Summons  
on Hilliard P. Jenkins  
John B. Jenkins, &  
By service on Amelia Jenkins  
Owners of Jenkins Farms  
WALTON WILSONS, Sheriff  
By For Christian

no 2328

SUMMONS

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

ALABAMA RESEARCH CHEMISTS INC.  
Plaintiff

VS.

HILLIARD P. JENKINS, JOHN  
JENKINS AND AMELIA JENKINS,  
d/b/a Jenkins Farms  
Defendant

FILED

JUL 12 1954

ALICE L. DUCK, Clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

2328

2302

138.00

69.00

207.00

ALABAMA RESEARCH CHEMISTS, INC.,

Plaintiff,

vs.

HILLARD P. JENKINS, et al., In-  
dividually and doing business as  
JENKINS FARMS,

Defendants.

\*\*\*\*\*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

\*\*\*\*\*

DEMURRER

\*\*\*\*\*

FILED

AUG 21 1954

ALICE A. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

WRIT ON JUDGMENT

THE STATE OF ALABAMA, )

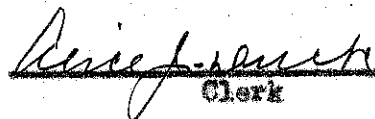
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

Whereas Forest A. Christian has made affidavit as required by law that Alabama Research Chemists, Inc. at the March Term, 1956, of the Circuit Court of Baldwin County recovered a judgment against Hilliard P. Jenkins, John Jenkins and Amelia Jenkins, individually, and doing business as Jenkins Farms, for the sum of TWO THOUSAND FIVE HUNDRED & 00/100 DOLLARS (\$2,500), plus interest from date of judgment, and the further sum of THIRTY ONE & 75/100 DOLLARS (\$31.75) cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Fred Neumiller has, or is believed to have in his possession or under his control, money or effects belonging to the defendants, or that he is or is believed to be indebted to the defendants, or to be liable to them on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

These are therefore to command you, that you summon the said Fred Neumiller to be and appear at the next Term of Circuit Court of Baldwin County to be holden for said county, within thirty days after the service of this writ of garnishment, then and there to answer on oath, whether at the time of service of this writ, or at the time of making his answer, he has in his possession, or under his control any money or effects belonging to the defendants; and whether he is indebted to said defendants, or is liable to them on any contract for the payment of money or the delivery of personal property or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

Witness, Alice J. Duck, Clerk of said Court at office, this the 8th day of September, 1956.

  
Clerk

WRIT ON JUDGMENT

THE STATE OF ALABAMA, )


BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

Whereas Forest A. Christian has made affidavit as required by law that Alabama Research Chemists, Inc. at the March Term, 1956, of the Circuit Court of Baldwin County recovered a judgment against Hilliard P. Jenkins, John Jenkins and Amelia Jenkins, individually, and doing business as Jenkins Farms, for the sum of TWO THOUSAND FIVE HUNDRED & 00/100 DOLLARS (\$2,500), plus interest from date of judgment, and the further sum of THIRTY ONE & 75/100 DOLLARS (\$31.75) cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Fred Neumiller has, or is believed to have in his possession or under his control, money or effects belonging to the defendants, or that he is or is believed to be indebted to the defendants, or to be liable to them on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

These are therefore to command you, that you summon the said Fred Neumiller to be and appear at the next Term of Circuit Court of Baldwin County to be holden for said county, within thirty days after the service of this writ of garnishment, then and there to answer on oath, whether at the time of service of this writ, or at the time of making his answer, he has in his possession, or under his control any money or effects belonging to the defendants; and whether he is indebted to said defendants, or is liable to them on any contract for the payment of money or the delivery of personal property or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

Witness, Alice J. Duck, Clerk of said Court at office, this the 8th day of September, 1956.

  
Clerk

### MANUFACTURERS OF LIQUID FERTILIZER

*Loxley, Alabama*

Date 8/6/53

How Ship *Picked up*

When Ship \_\_\_\_\_

Street &amp; No.

City &amp; State

*L. Jenkins*  
Buyer

*K. Petersen*  
Salesman