

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

February 7, 1955

Hon. H. M. Hall  
Judge of Circuit Court  
Bay Minette, Alabama

Re: H. Kennedy  
vs: Sam Childress  
Case No. 2482

Dear Judge Hall:

Kindly render judgment in this case for \$180.00, plus \$15.00 interest, for a total of \$195.00. There is a statement and affidavit attached to the original suit.

Yours very truly,



FOREST A. CHRISTIAN

BOOK 002 PAGE 342

SUMMONS

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon, SAM CHILDRESS, to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, at Bay Minette, then and there to answer the complaint of H. KENNEDY.

Witness my hand this the 21 day of December, 1954.

David J. Hensley  
Clerk

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COMPLAINT

H. KENNEDY,  
PLAINTIFF  
VS:  
SAM CHILDRESS,  
DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COUNT I:

The plaintiff claims of the defendant the sum of ONE HUNDRED EIGHTY & 00/100 DOLLARS (\$180.00), together with interest thereon, due from him by account on, to wit: the 15th day of August, 1953, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant the sum of ONE HUNDRED EIGHTY & 00/100 DOLLARS (\$180.00), together with interest thereon, due from him by account stated between the plaintiff and the defendant, on to wit: the 15th day of August, 1953, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant the sum of ONE HUNDRED EIGHTY & 00/100 DOLLARS (\$180.00), together with interest thereon, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant, on to wit: the 15th day of August, 1953, which sum of money, with interest thereon, is still unpaid.

There is attached to the original and made a part hereof, an itemized statement of account, sworn to by a competent witness, showing the amount due on this account as of the 20th day of December, 1954.

David J. Hensley  
Attorney for Plaintiff

The defendant resides at  
Robertsdale, Alabama

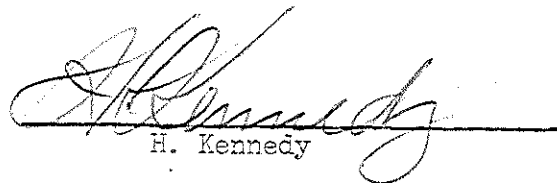
AFFIDAVIT OF H. KENNEDY

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

H. KENNEDY, first being duly sworn, deposes and says as follows:

My name is H. Kennedy; I am owner of H. KENNEDY, a Seed, Fertilizer and Insecticide business in Summerdale, Alabama, and On August 15, 1953, Sam Childress purchased 2,000 pounds of B.H C Dust, at a cost to him of \$180.00; nothing has been paid on this account, and after allowing all just and due credits, there still remains due and unpaid the full amount of \$180.00.

  
H. Kennedy

Sworn to and Subscribed before me this  
the 20th day of December, 1954.

FILED

12-21-54

ALICE J. BUCK, Clerk

  
Notary Public

Received 24 day of Dec 1954  
and on 5 day of Jan 1955  
I served a copy of this within  
on Sam Childress

By service on \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

By Edleigh Steadham, S.

SUMMONS AND COMPLAINT

H. KENNEDY,  
PLAINTIFF

VS:  
SAM CHILDRESS,  
DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

FILED  
12-21-54  
ALICE J. BUCK, Clerk

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