

2993

KENYON PARSONS & COMPANY,
A Corporation,

PLAINTIFF

VS.

JULIAN KIRK,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

C O M P L A I N T


COUNT I

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED NINETY-EIGHT DOLLARS AND TWELVE CENTS (\$598.12) due from him by account on, to-wit, the thirtieth day of June, 1956, which sum of money, with the interest thereon, is still unpaid.



E. G. RICKARBY
Attorney for the Plaintiff

Note: The account sued on is evidenced by itemized and verified statement of account filed herewith.



E. G. RICKARBY
Attorney for the Plaintiff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JULIAN KIRK

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 JULIAN KIRK

-----, Defendant-----

by KENYON PARSONS & COMPANY, A Corporation

-----, Plaintiff-----

Witness my hand this 31 day of July 1956

Alice J. Duck, Clerk

KENYON PARSONS & COMPANY

Insurance Brokers

249 RIVERSIDE AVENUE
JACKSONVILLE 2, FLORIDA

June 30, 1956

Mr. Julian Kirk
Gulf Shores,
Alabama

DATE	DESCRIPTION	CHARGES	CREDITS	BALANCE
1952	"MARTHA K"			
	BALANCE FROM PREVIOUS STATEMENT			
Aug. 29	\$8,000 Hull Ins. Lloyds & Cos. 10210	558.23		558.23
1954	Interest at 6% from 8-29-52 to 4-13-54	53.87		612.10
Apr. 13	Cash			
	Interest at 6% from 4-13-54 to 8-16-54	11.04	75.00	537.10
Aug. 16	Cash			548.14
	Interest at 6% from 8-16-54 to 6-30-56	59.98	10.00	538.14
				598.12
				PAY LAST AMOUNT IN THIS COLUMN

COUNTY OF DuvalSTATE OF Florida

Be it remembered, that on this 25th day of July
 A. D., 1956, personally appeared before me, the undersigned authority,
B. A. Canepa known to me

who being duly sworn, upon his oath stated that he is Treasurer
 of Kenyon Parsons & Company

{ a corporation organized and doing business under the laws of the State of Florida
 and has been duly authorized by said corporation to make this affidavit
 { ~~a partnership composed of~~

~~a sole trader doing business as~~
 and that as such he makes this affidavit; that he is familiar with the books and business of
 said Kenyon Parsons & Company; that the attached account against
Julian Kirk of Gulf Shores, Alabama

is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
 posing the said account were sold and delivered to said Julian Kirk

at { its
~~their~~
his } special instance and request, that credit has been duly given for all payments and
 just and lawful offsets to which said account is entitled as thereon stated, and that the balance
 thereof, amounting to the sum of Five hundred ninety-eight and 12/100 Dollars
 (\$ 598.12) with interest from June 30 1956 is justly due and
 remains unpaid.

B. A. Canepa X

I hereby certify under my official seal that I am authorized as a Notary Public to
 administer oaths under the laws of the State of Florida
 and that the foregoing was subscribed and sworn to before me on the day and year
 first above stated.

Blenda S. Smith

Notary Public

County of Duval State of Florida
 My commission expires October 18 A. D. 1959

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

July 31, 1956

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Kenyon Parsons & Co.
vs.
Julian Kirk
Our File: 3812

With this we are handing you Summons and Complaint
and itemized and verified statement of account, and
deposit for costs in the sum of \$20.00 in the above
styled cause.

Please process and oblige.

Yours very truly,



EGR/fm
Encl.

cc: Dun & Bradstreet, Inc.
dupl.
w/Encl. (dup)

598¹²
598
\$ 604.10