

S U M M O N S

STATE OF ALABAMA	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
COUNTY OF BALDWIN	)	AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA - - - GREETING:

You are hereby commanded to summons James M. Campbell to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of H. Kennedy.

Witness my hand this 19 day of Nov, 1958.

David J. Smith  
Clerk

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C O M P L A I N T

H. Kennedy	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
VS.	)	
James M. Campbell	)	AT LAW
Defendant	)	<u>3707</u>

I.

The plaintiff claims of the defendant Four Thousand Two Hundred Five & NO/100ths (\$4,205.00) Dollars, due from him on account, to-wit: the 23rd day of November, 1957, which sum of money, with interest thereon, is still unpaid.

II.

The plaintiff claims of the defendant Four Thousand Two Hundred Five & NO/100ths (\$4,205.00) Dollars, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: 23rd day of November, 1957, which sum of money, with interest thereon, is still unpaid.

James A. Smith  
Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof, an itemized statement of account verified by affidavit of (Mrs.) Thelma Stephens, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 23rd day of November, 1957, and due at present.

The defendant resides at Robertsdale, Alabama.

Received 19 day of Nov 1958

and on 3 day of Dec 1958

I served a copy of the within D.C.

to James M. Campbell

by service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By Edleigh Steadman, D. S.

Sheriff claims 52 miles at +

Ten Cents per mile Total \$ 5.20

TAYLOR WILKINS, Sheriff

BY Edleigh Steadman  
DEPUTY SHERIFF

Paymaster

3707 ✓

H. Kennedy

VS

James M. Campbell

STATE OF ALABAMA  
BALDWIN COUNTY

Before me, David L. McKeown, a Notary Public, in  
and for said County and State, personally appeared Mrs.  
Thelma Stephens who, being by me first duly sworn,  
deposes and says, that She is bookkeeper for H. Kennedy  
and that the annexed statement of the account of said H.  
Kennedy against James M. Campbell of Robertsdale, Ala.  
is just, true and correct, that there is now due on said  
account the sum of \$4205.00, after deducting all credits,  
set-off or any counterclaims.

Mrs. Thelma Stephens  
Bookkeeper

Sworn to and subscribed before me this 10th day of  
Nov. 19 58.

David L. McKeown  
Notary Public, Baldwin County  
Alabama.

My Commission Expires December 19, 1959

My Commission Expires \_\_\_\_\_

Sheet No.

Account No. *H. Kennedy*

Terms

NAME

*J. M. Campbell*

ADDRESS

*Robertsdale, Ala*

Rating

Credit Limit

DATE	TERMS	FOLIO	DEBITS	CREDITS	BALANCE
<i>56</i>					
12 6	30 Bu Anderson wheat @ 4.25	3732	127 50		127 50
7	40 Bu Anderson wheat @ 4.25	3820	170 00		297 50
1957					
3 4	14 ton 4-12-12, <sup>42.00</sup> 6 ton 0-14-14 <sup>36.50</sup>	4481	807 00		1104 50
29	2 ton 4-12-12	4776	84 00		1188 50
6 12	120 bu. Cert Jackson Soybeans @ 4.25	6062	510 00		
	15 <sup>th</sup> Parathion <sup>02</sup> 104 bu Hartz Ogden @ 4.25	6038	443 25		2141 85
7 2	Returned 15 <sup>th</sup> Parathion <sup>02</sup>	6503		1 25	
	8 Bu Jackson <sup>4.25</sup>	6502	34 00		2174 50
25	15 <sup>th</sup> Haf 2-1 <sup>4.00</sup>	6860	60 00		2234 50
29	55 Haf 25 <sup>th</sup> D.D.T.	6926	93 50		2328 00
8 9	2-55 Haf 25 <sup>th</sup> D.D.T.	7128	187 00		2515 00
22	1 Haf D.D.T. & Phosphor <sup>4.50</sup>	7308	4 50		2519 50
26	25 Haf Parathion, <sup>610</sup> 2-55 Haf D.D.T. <sup>1.80</sup>	7339	339 50		2859 00
	10 Haf Parathion	7425	61 00		2920 00
29	CR	7443		400 50	2519 50
29	CR #2146	C79	400 50		2920 00
10 21	CR #2341	C94	250 00		3170 00
24	CR #2388 Bean Adv	C96	400 00		3570 00
11 12	CR #2581 Bean Adv	C106	485 00		4055 00
23	CR 2768 Bean Adv	C114	150 00		4205 00

H. KENNEDY

PLAINTIFF

VS

JAMES M. CAMPBELL

DEFENDANT

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

DEMURRERS

Comes now the Defendant in the above styled cause and files the following demurrers to the Plaintiff's Complaint and to each and every count thereof separately and severally:

1.

The Complaint fails to state a cause of action.

2.

The Complaint is ambiguous.

3.

The Complaint fails to show whether the Exhibit A is a part of Count 1 or a part of Count 2.

Wilters & Brantley

BY: Robert M Brantley  
Attorneys for the Defendant

The Defendant demands a trial by jury.

Wilters & Brantley

BY: Robert M Brantley  
Attorneys for the Defendant

*Filed*  
*1-2-59*

*Jerry*  
3707

H. KENNEDY

PLAINTIFF

VS

JAMES M. CAMPBELL

DEFENDANT

DEMURRERS

FILED

JAN 12 1950

ALICE J. DUCK, CLERK  
REGISTER

H. KENNEDY,  
Plaintiff,

vs

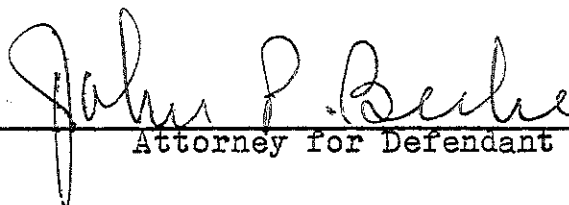
JAMES M. CAMPBELL,  
Defendant.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

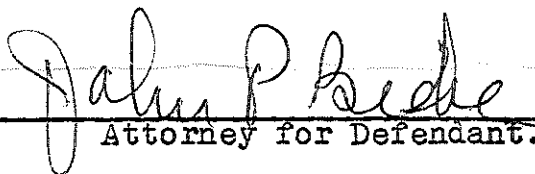
) AT LAW

Comes the Defendant in the above entitled cause and for answer to the complaint filed therein says that the allegations of the complaint are untrue.

  
\_\_\_\_\_  
Attorney for Defendant

The Defendant demands trial by jury.

I hereby certify that I have on this the 23rd day of December, 1959, sent a true and exact copy of the foregoing answer by United States Mail, postage prepaid, to Mr. James A. Brice, Foley, Alabama, attorney of record for the Plaintiff.

  
\_\_\_\_\_  
Attorney for Defendant?

FILED  
DEC 23 1959  
ALICE J. DUCK, Clerk



December 15, 1959

Mr. James M. Campbell  
Robertsdale, Alabama

Dear Mr. Campbell:

We are withdrawing our appearance in the three cases now filed in court against you, these cases being No. 3708, 3707 and 3721. Please employ another attorney to pursue this matter for you if you see fit. Unless this is done within thirty days a default judgment will probably be rendered against you.

Yours truly,

Walters & Brantley

By:

*Robert M. Brantley*  
Robert M. Brantley

TMB/aw

FILED

DEC 16 1959

ALICE J. DUCK, CLERK  
REGISTER