

S U M M O N S

STATE OF ALABAMA  
COUNTY OF BALDWIN

)  
)  
)

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
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 Kenco Chemical Company, a corporation.

Witness my hand this 19 day of Nov, 1958.

Eric J. Ruck  
Clerk

*64-12-3-58*  
\* \* \* \* \*

C O M P L A I N T

KENCO CHEMICAL COMPANY, a  
corporation  
  
Plaintiff  
  
vs.  
  
JAMES M. CAMPBELL  
  
Defendant

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)

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
  
AT LAW

3708

I.

The plaintiff claims of the defendant One Hundred Eighty-nine & 75/100ths (\$189.75) Dollars, due from him on account, to-wit: the 16th day of July, 1956, which sum of money, with interest thereon, is still unpaid.

II.

The plaintiff claims of the defendant One Hundred Eighty-nine & 75/100ths (\$189.75) Dollars, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: the 16th day of July, 1956, which sum of money, with interest thereon, is still unpaid.

James A. [Signature]  
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 16th day of July, 1956, and due at present.

The defendant resides at Robertsdale, Alabama.

3708

Received 19 day of Nov 1931  
 1 on 3 day of Dec 1931  
 Received a copy of the within REC  
James M Campbell

Kenco Chemical Co.

vs  
 James M. Campbell

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  
Rosinton

189.75

STATE OF ALABAMA  
BALDWIN COUNTY

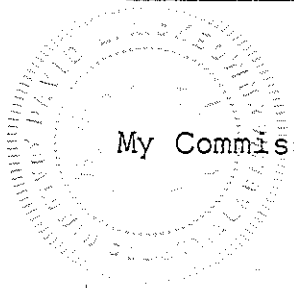
Before me, David L. Mckeown, a Notary Public, in and for said County and State, personally appeared Mrs. Thelma Stephens who, being by me first duly sworn, deposes and says, that she is bookkeeper for Kenco Chemical Co. and that the annexed statement of the account of said Kenco Chemical Co. against James M. Campbell of Robertsdale, Ala. is just, true and correct, that there is now due on said account the sum of \$189.75, after deducting all credits, set-off or any counterclaims.

Mrs Thelma Stephens  
Bookkeeper

Sworn to and subscribed before me this 10th day of Nov. 1958.

David L M Keown  
Notary Public, Baldwin County  
Alabama.  
My Commission Expires December 19, 1959.

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



Statement

SUMMERDALL, ALA., 11-8 1958

# KENCO Chemical Company

"LEADERS IN LIQUID" FERTILIZER

Mr. James Campbell  
Robertsdale, Ala.

WHITEHALL 3-6651

P. O. BOX 153

DATE	ITEMS	CHARGES	CREDITS	BALANCE
1956				
6/18	2 - 30 Gal # 360	150.00		150.00
1/16	2 - 5 Gal # 389	39.75		189.75
1/26	CR # 133		189.75	0.00
1/30	CR not cleared # 141	189.75		189.75

70

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 3711. 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/ew

FILED

DEC 16 1959

ALICE I. DUCK, CLERK  
REGISTER

KENCO CHEMICAL COMPANY, A  
CORPORATION,

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.

Wiltors & Brantley

BY: Salter M Brantley  
Attorneys for the Defendant

The Defendant demands a trial by jury.

Wiltors & Brantley

BY: Salter M Brantley  
Attorneys for the Defendant

*Filed*  
*1-2-59*

3708

*copy*

KENCO CHEMICAL COMPANY,  
A CORPORATION,

PLAINTIFF

VS

JAMES M. CAMPBELL

DEFENDANT

DEMURRERS

**FILED**

JAN 21 1933

ANNIE L. DUCK, CLERK  
RECORDED



KENCO CHEMICAL COMPANY, a  
Corporation,

Plaintiff,

vs

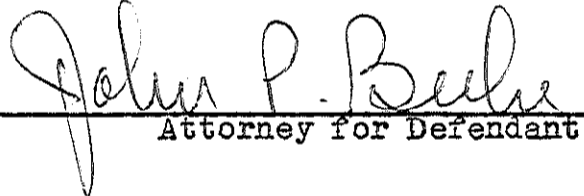
JAMES M. CAMPBELL,  
Defendant.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW

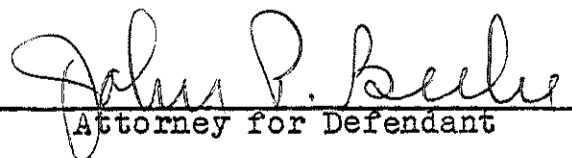
Comes the Defendant in the above entitled cause and for answer to the complaint filed therein says that the allegations of the complaint are untrue.

  
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.

FILED  
DEC. 23, 1959  
ALICE L. DUCK, Clerk

  
Attorney for Defendant