

CECIL G. CHASON

ATTORNEY-AT-LAW

FOLEY, ALABAMA

September 2, 1959

3963

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

Dear Mrs. Duck:

Enclosed herewith is Bill of Complaint of Nitrogen Service,  
Inc., an Alabama Corporation -vs- William M. Campbell, and  
a Bill of Complaint of H. Kennedy -vs- William M. Campbell.

Yours very truly,



C. G. Chason

CGC:fm

encls. as noted.

NITROGEN SERVICE, INC.,  
an Alabama Corporation,

Plaintiff,

vs.

WILLIAM M. CAMPBELL,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

DEMURRER

Comes the Defendant in the above styled cause and demurs to the complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That the allegations of said complaint are vague and indefinite.
3. That said count does not allege that the note sued on was made by the Defendant.

*Shason & Stone*  
Attorneys for Defendant

Defendant demands a trial of this cause by jury.

*Shason & Stone*  
Attorneys for Defendant

FILED

SEP 11 2009

ALICE J. DUCK, CLERK  
REGISTER

3963

NITROGEN SERVICE, INC., an  
Alabama Corporation,

Plaintiff,

vs.

WILLIAM M. CAMPBELL,

Defendant

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

\* \* \* \* \*

DEMURRER

\* \* \* \* \*

STATE OF ALABAMA

BALDWIN COUNTY

That certain Judgment rendered in favor of Nitrogen Service, Inc., an Alabama Corporation, on the 26th day of February, 1960, against William M. Campbell, Certificate of which is recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Judgment Book 10, Page 40, having been paid, the same is hereby cancelled and discharged of record.

*July 18, 1960*

NITROGEN SERVICE, INC.,

BY

*[Signature]*  
As its President

WITNESSES:

*Thomas Stephens*  
\_\_\_\_\_  
\_\_\_\_\_STATE OF ALABAMA,  
BALDWIN COUNTY

I certify that this instrument was filed on

SEP 12 1960 *[Signature]*and that no tax was collected. Recorded in *[Signature]*  
Book 10  
Page 281 *[Signature]*  
Judge of ProbateBy *[Signature]*

3963 -

Nitrogen ser,  
vs  
Campbell.

R15:

Alice J. Duck

LIBRARY  
UNIVERSITY OF CALIFORNIA

636 13 1021 1111

RECEIVED  
JAN 10 1964

STATE OF ALABAMA )  
BALDWIN COUNTY ) . . . IN THE CIRCUIT COURT . . LAW SIDE . . .

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon William M. Campbell to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of Nitrogen Service, Inc., an Alabama corporation.

WITNESS my hand this the 3 day of September, 1959.

*Heifer-Ruck*  
Clerk

\*\*\*\*\*  
\*\*\*\*\*

- COMPLAINT -

NITROGEN SERVICE, INC., an	)	
Alabama Corporation,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
	)	
-VS-	)	BALDWIN COUNTY, ALABAMA
	)	
WILLIAM M. CAMPBELL,	)	LAW SIDE
	)	
Defendant.	)	

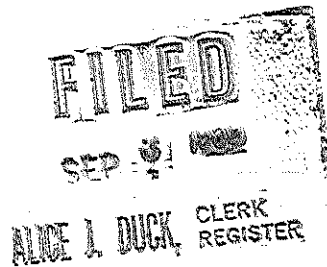
COUNT I

The Plaintiff claims of the Defendant Three Thousand Three Hundred Twenty-nine and 76/100 Dollars (\$3,329.76) due by Promissory Note made *by the Defendant* on, to-wit, June 14, 1958, and payable in installments on, to-wit, July 1, 1958, January 1, 1959, in the amount of Three Hundred Thirty-two and 98/100 Dollars (\$332.98), plus interest, and the sum of Three Hundred Thirty-two and 98/100 Dollars (\$332.98) plus interest, on or before the 1st day of each successive July and January thereafter, which said Note provides that default in the payment of any installment on the due date thereof, and said default continuing for one (1) year, shall make all installments due, and default having been made in the said payments due as of July 1, 1958, January 1, 1959, and July 1, 1959, and said default continuing, Plaintiff claims the sum of Three Thousand Three Hundred Twenty-nine and 76/100 Dollars (\$3,329.76) as aforesaid, plus

interest at the rate of four per cent (4%) per annum, from June 14, 1958.

Plaintiff avers that in and by the terms of said NOte the Defendant waived all rights of exemption under the Constitution and Laws of Alabama and any other State, and of this Waiver the Plaintiff now claims the benefit.

The Plaintiff further avers that in and by the terms of said note the Defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure this note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of Five Hundred Dollars (\$500.00) as such reasonable attorney's fee.



  
Attorney for Plaintiff

ived 3 day of Sept 1958  
 on 4 day of Sept 1959  
 rved a copy of the within. Wm. M. Campbell

TAYLOR WILKINS, Sheriff  
By: Edleigh Steashaw D. S.

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 3.00

TAYLOR WILKINS, Sheriff

BY W.D.  
DEPUTY SHERIFF

Robert Dale, aka

NITROGEN SERVICE, INC., an  
Alabama Corporation,  
Plaintiff,

-VS-

WILLIAM M. CAMPBELL,  
Defendant.

( ) ( ) ( ) ( )    ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) (

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

LAW SIDE

( ) ( ) ( ) ( ) ( ) ( ) ( ) ( )

FILED

SEP 3 1987

**ALICE J. DUCK, CLERK**  
**REGISTER**

CECIL G. CHASON  
ATTORNEY AT LAW  
FOLEY, ALABAMA