

4065

H. Kennedy

STATE OF ALABAMA
BALDWIN COUNTY

Before me, David L. Mckeown, a Notary Public, in and for said County and State, personally appeared Mrs. Thelma Stepehns 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 Mr. Ellis A. Wayand of Fairhope, Alabama is just, true and correct, that there is now due on said account the sum of \$124.20, after deducting all credits, set-off or any counterclaims.

Thelma Stephens
Bookkeeper

Sworn to and subscribed before me this 27th day of Jan 19 59.

David L. Mckeown
Notary Public, Baldwin County
Alabama.

My Commission Expires My Commission Expires December 19, 1959

SUMMONS AND COMPLAINT

Baldwin Times

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 ELLIS A. WAYAND

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 ELLIS A. WAYAND

....., Defendant

by H. KENNEDY

....., Plaintiff.....

Witness my hand this 25 day of Nov 1959.....

Arice J. Duck Clerk

No. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

H. KENNEDY

Plaintiffs

vs.

ELLIS A. WAYAND

Defendants

SUMMONS and COMPLAINT

Filed, 19.....

....., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

....., 19.....

....., Sheriff

I have executed this summons

this, 19.....

by leaving a copy with

..... Sheriff

..... Deputy Sheriff

H. KENNEDY

WHITEHALL 3-6651

Mr. Ellis A. Wayand
Fairhope, Ala

SEEDS - FERTILIZER - INSECTICIDES

DATE	ITEMS	CHARGES	CREDITS	BALANCE
7/29/57	# 8144 20 Bu. Nortep oats ^{1.85-} 240 lb. P. S. Clover ^{.32} 8 Sps 0-14-14	129.80		129.80
1/18/57	# 8648 16 Bu. Ref Rust oats ^{1.857} 40 Sps 0-14-14	109.60		239.40
	# 8649 P. M. A. Clover		23.60	115.20
	P. M. A. Oats		34.56	124.20
	P. M. A. 0-14-14		47.04	
			115.20	

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

} No.

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon **ELLIS A. WAYAND**

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 **ELLIS A. WAYAND**

....., Defendant

by **H. KENNEDY**

....., Plaintiff.....

Witness my hand this 29th day of Nov 1959....

Amie J. Duck, Clerk

4065

No. _____ Page _____

**THE STATE OF ALABAMA
BALDWIN COUNTY**

CIRCUIT COURT

H. KENNEDY

Plaintiffs

vs.

ELLIS A. WAYAND

Defendants

SUMMONS and COMPLAINT

Filed _____, 19.....

FILED

NOV 25 1959

_____, Clerk

ALICE J. DUCK, CLERK REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

_____, 19.....

_____, Sheriff

I have executed this summons

this _____, 19.....

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

C O M P L A I N T

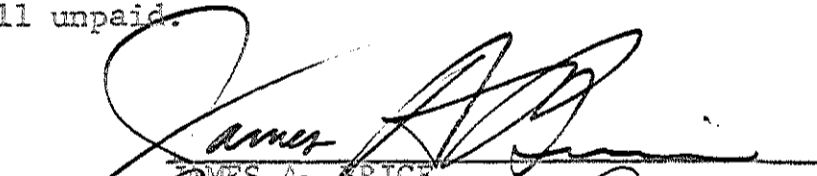
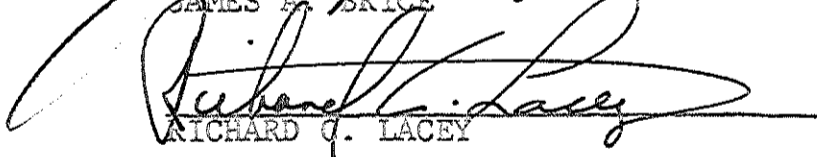
H. KENNEDY,) IN THE CIRCUIT COURT OF
PLAINTIFF)
VS.) BALDWIN COUNTY, ALABAMA
ELLIS A. WAYAND,) AT LAW.
DEFENDANT.)

I.

The Plaintiff claims of the Defendant One Hundred Twenty Four and 20/100 (\$124.20) Dollars, due from him on account, to-wit: the 18th day of November, 1957, which sum of money, with interest thereon, is still unpaid.

II.

The Plaintiff claims of the Defendant One Hundred Twenty Four and 20/100 (\$124.20) Dollars, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: the 18th day of November, 1957, which sum of money, with interest thereon is still unpaid.


JAMES A. BRICE

RICHARD Q. LACEY

ATTORNEYS FOR PLAINTIFF

There is attached hereto as Exhibit "A" and made a part hereof, an itemized statement of account verified by D. L. McKeown, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 18th day of November, 1957.

The Defendant resides in Fairhope, Alabama.

4065

Received 25th day of Nov 1959

and on _____ day of _____ 19____

I served a copy of the within
on Ellis A. Wayand

By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

*not found
This man in
Birmingham Ala*

Returned 15 day of Dec 1959

Not found in my county after diligent search and inquiry,

Taylor Wilkins, Sheriff

By Shannon
Deputy Sheriff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

H. KENNEDY,

PLAINTIFF

VS.

ELLIS A. WAYAND,

DEFENDANT.

FILED

NOV 25 1959

ALICE T. DUCK, CLERK
REGISTER

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA