

LAW OFFICES  
JAMES A. BRICE  
FOLEY, ALABAMA

JAMES A. BRICE  
RICHARD C. LACEY

P. O. Box 298  
WHITEHALL 3-3601

December 24, 1959

Mrs. Alice J. Duck  
Clerk-Register, Circuit Court  
Bay Minette, Alabama

Re: H. Kennedy  
vs: Mearill Northcutt  
At Law 4066

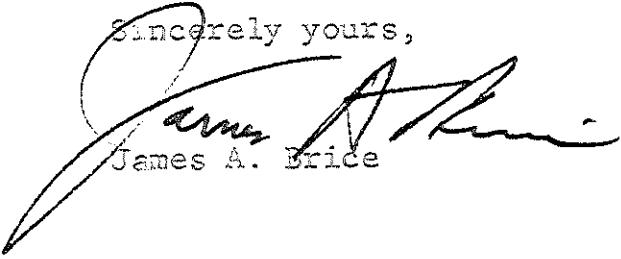
Re: Carolyn B. Smith  
vs: Thomas A. Smith  
In Equity 4798

Dear Mrs. Duck:

This will confirm my telephoned request that the above cases be dismissed without prejudice, and that cost bills be sent me.

Thank you.

Sincerely yours,

  
James A. Brice

JAB/vd

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 Commanded to Summon MEARILL NORTHCUT

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 MEARILL NORTHCUT

....., Defendant .....

by H. KENNEDY

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

Witness my hand this 25 day of Nov 19 59

W. J. French, Clerk

No. ....

Page .....

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

**H. KENNEDY**

Plaintiffs

vs.

**MEARILL NORTHCUT**

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

C O M P L A I N T

|                   |   |                         |
|-------------------|---|-------------------------|
| H. KENNEDY,       | ) | IN THE CIRCUIT COURT OF |
| PLAINTIFF,        | ) |                         |
| VS.               | ) | BALDWIN COUNTY, ALABAMA |
| MEARILL NORTHCUT, | ) | AT LAW.                 |
| DEFENDANT.        | ) |                         |

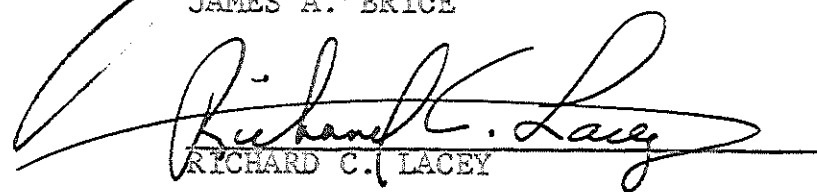
I.

The Plaintiff claims of the Defendant the sum of One Hundred Eighty and No/100 (\$180.00) Dollars, due from him on account, to-wit: the 21st day of December, 1957, which sum of money, with interest thereon, is still unpaid.

II.

The Plaintiff claims of the Defendant the sum of One Hundred Eighty and No/100 (\$180.00) Dollars, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: the 21st day of December, 1957, which sum of money, with interest thereon, is still unpaid.

  
JAMES A. BRICE

  
RICHARD C. 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 21st day of December, 1957, and due at present.

The Defendant resides in Robertsedale, Alabama.

WHITEHALL 3-6651

Mr. Merrill Northcutt  
Robertsdale Ala.

| DATE  | ITEMS                           | CHARGES | CREDITS | BALANCE |
|-------|---------------------------------|---------|---------|---------|
| 1957  |                                 |         |         |         |
| 12/21 | # 9026                          |         |         |         |
|       | 40 Bu Coke 47-27 <sup>452</sup> | 180.00  |         | 180.00  |

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 Merrill Northcutt of Robertsdale, Ala. is just, true and correct, that there is now due on said account the sum of \$180.00, 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

No. 4066

Received 25 day of Nov 1959  
and on 7 day of Dec 1959

I served a copy of the within  
on Mearill Northcut

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Edleigh Stallions

Mr. Rosinton

Sheriff claims 52 miles at  
Ten Cents per mile Total \$ 5.20  
TAYLOR WILKINS, Sheriff  
BY 62  
DEPUTY SHERIFF

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

H. KENNEDY,

PLAINTIFF

VS.

MEARILL NORTHCUT

FILED

NOV 25 1959

ALICE I. DUCK, CLERK  
REGISTER

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA