

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

Post Office Box 298

WHITEHALL 3-3601

February 22, 1960

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

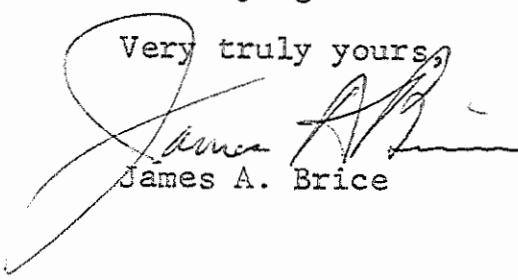
Re: Kenco Chemical Company
vs: Verlan Carver
At law No. 4073

Dear Mrs. Duck:

Please place the above file before Judge Hall for a judgment for Plaintiff against defendant by default, for \$101.00 on account, plus \$5.55 interest, a total of \$106.55.

Please send me a certificate of judgment.

Very truly yours,


James A. Brice

JAB/vd

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 - - - - GREETINGS:

You are commanded to summons Verlan Carver 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.

Richard C. Lacey
CLERK

APR 18 1960

C O M P L A I N T

KENCO CHEMICAL COMPANY,
a corporation,

PLAINTIFF,

VS.

VERLAN CARVER,

DEFENDANT.

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

I.

The Plaintiff claims of the Defendant One Hundred One and No/100 (\$101.00) Dollars, due from him on account, to-wit: the 15th day of March, 1959, which sum of money with interest thereon, is still unpaid.

II.

The Plaintiff claims of the Defendant One Hundred One and No/100 (\$101.00) Dollars, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant, on, to-wit: the 15th day of March, 1959, which sum of money, with interest thereon is still unpaid.

James A. Price
JAMES A. PRICE
Richard C. Lacey
RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

There is attached hereto as Exhibit "A" and made a part thereof an itemized statement of account verified by affidavit of D. L. McKeown, a competent witness, sworn to before a Notary Public which statement shows the amount due on this account as of the 15th day of March, 1959, and due at the present.

The Defendant resides at Foley, Alabama.

A F F I D A V I T

STATE OF ALABAMA)

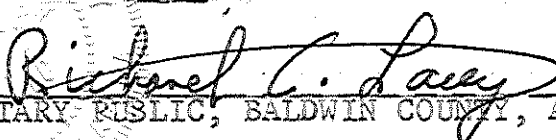
COUNTY OF BALDWIN)

Before me, Richard C. Lacey, a Notary Public in and for said County in said State, personally appeared D. L. McKeown, who, being by me first duly sworn, deposes and says:

That he is the Office Manager of the Kenco Chemical Company, a corporation; that the annexed statement of account of said Kenco Chemical Company against Verlan Carver is just, true, and correct; that there is now due on said account One Hundred One and No/100 (\$101.00) Dollars, after deducting all credits, set-offs or counterclaims.


D. L. McKEOWN

Sworn to and subscribed before me on
this the 25 day of November, 1959.


NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

STATEMENT

SUMMERDALE, ALA.,

7-20

, 1959

M. S. Velan Carter

Troy, Ala

IN ACCOUNT WITH

KENCO Chemical Co.

Summerdale, Alabama

1959						
3/11	4500					
	10 Gal. Duo-Crop	2.60	26.00			
3/15	4505					
	30 Gal. Duo-Crop	2.50	75.00	101	00	

70,4073

Received 28 day of Nov 1955
and on 18 day of Jan 1960
served a copy of the within 800
on Verlan Carver

By service on _____

TAYLOR WILKINS, Sheriff

D. S.

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

KENCO CHEMICAL COMPANY, a
corporation,

PLAINTIFF,

VS.

VERLAN CARVER,

DEFENDANT.

Sheriff claims 86 miles at

Ten Cents per mile Total \$ 8.60

TAYLOR WILKINS, Sheriff

BY CC
DEPUTY SHERIFF

FILED

NOV 27 1959

ALICE J. DUCK, CLERK
RECORDED

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA