

41101

C O M P L A I N T



PAUL L. CLEVERDON,)	IN THE CIRCUIT COURT OF
)	
PLAINTIFF,)	BALDWIN COUNTY, ALABAMA
)	
VS.)	AT LAW.
)	
HILLIARD P. JENKINS, individually,)	
and d/b/a Jenkins Farms)	
)	
DEFENDANT.)	

I.

The Plaintiff claims of the Defendant One Hundred Eighteen and No/100 (\$118.00) Dollars, due from him on account, to-wit: the 21st day of December, 1956, which sum of money, with interest thereon, is still unpaid.

II.

The Plaintiff claims of the Defendant One Hundred Eighteen and No/100 (\$118.00) Dollars, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: the 21st day of December, 1956, 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 affidavit of Jerry Brackman, 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, 1956,

The Defendant resides at Loxley, 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 Jerry Brackman, who, being by me first duly sworn, deposes and says: That he is the General Manager for Paul L. Cleverdon; that the annexed statement of account of said Paul L. Cleverdon against Hilliard P. Jenkins, individually, and d/b/a Jenkins Farms, is just, true and correct; that there is now due on said account the sum of One Hundred Eighteen and No/100 (\$118.00) Dollars, after deducting all credits, set-offs, and counterclaims.


JERRY BRACKMAN

Sworn to and subscribed before me on this

9 day of December, 1959.


Notary Public, Baldwin County, Alabama

STATEMENT

SUMMERDALE, ALA.,

Dec 1, 1959

M

Jenkins Farms
Lopley, Ala.

IN ACCOUNT WITH

Paul L. Cleverdon

GROWER AND SHIPPER OF PRODUCE

Seed and Fertilizer

3/19 55	5- 30 gal. drums Dithane		
	150 gal @ 1.65 gal.	247 50	
	3- 50 lb. sy zinc		
	150 lbs @ 11¢ lb	16 50	
	1- 30 gal. drums 95% DDT		
	30 @ 1.80 gal	54 00	
		318 00	
3/26 56	Rev. on acct	100 00	
11/21 56	Rev on acct	100 00	
	Bal Due		
	12/1/59	\$	118 00

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 HILLIARD P. JENKINS,

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 HILLIARD P.
JENKINS, individually, and d/b/a JENKINS FARMS, Defendant

by PAUL L. CLEVERDON

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

Witness my hand this 11 day of dec 1959

Alice J. Duck, Clerk

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No. ~~1101~~ Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

PAUL L. CLEVERDON

Plaintiffs

vs.

HILLIARD P. JENKINS, individually,

and d/b/a JENKINS FARMS

Defendants

SUMMONS and COMPLAINT

Filed 19.....

DEC 11 1959

ALICE J. DUCK, CLERK
REGISTERED

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

12/11, 1959

, Sheriff

I have executed this summons

this 12-16, 1959

by leaving a copy with

Hilliard P. Jenkins

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY *EA*
DEPUTY SHERIFF

Taylor Wilkins, Sheriff

Edwight Sheedman, Deputy Sheriff