

4124

Law Offices of
Horne, Webb & Tucker
Attorneys at Law
Atmore, Ala.

FRANK G. HORNE
DOUGLAS S. WEBB
J. R. TUCKER

TELEPHONE 49

January 6, 1959.

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

Dear Mrs. Duck:

We are sending herewith a suit we wish filed
in the matter of Talton O'Farrell vs. B. T. Turner.

Mr. Turner lives in Baldwin County, Alabama
near Perdido.

Please advise us when service is perfected.

Very truly yours,

HORNE, WEBB & TUCKER

BY Frank G. Horne

FGH/cb

The State of Alabama, BALDWIN County

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon B. T. TURNER

to appear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of Talton O'Farrell, doing business as O'Farrell Feed and Seed Company

Witness this 7 day of January, 1960, Allice J. Duck, Clerk.

IF THE DEFENDANT FAIL TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT

COMPLAINT

TALTON O'FARRELL, DOING

BUSINESS AS O'FARRELL FEED

AND SEED COMPANY

Plaintiff

VS.

B. T. TURNER

Defendant

And the Plaintiff claims of the Defendant Seven Thousand Three Hundred Sixty One and 52/100 (\$7,361.52) Dollars due by the Defendant to the

Plaintiff on open account to-wit; the 12th day of December, 1959, which said sum together with the interest thereon is due and unpaid.

COUNT TWO

The Plaintiff claims of the Defendant the sum of Seven Thousand Three Hundred Sixty One and 52/100 (\$7,361.52) for goods, wares and merchandise sold by the Plaintiff to the Defendant onto-wit; from the 7th day of March, 1958 to and including the 12th day of December, 1959, which said sum of monety together with the interest thereon is still due and unpaid.

HORNE, WEBB & TUCKER

BY: Frank E. Horne
Attorneys for Plaintiff.

There is filed in this cause a sworn itemized statement of account of the Defendant with the Plaintiff and notice is hereby given to the Defendant that the same will be used in evidence on the trial of this cause

HORNE, WEBB & TUCKER

BY: Frank E. Horne
Attorneys for Plaintiff.

FILED

JAN 7 1960

Code 1940, Tit. 7, Secs. 183, 218

Alice J. Duck, CLERK, REGISTER

Received this day of
....., 19.....
....., Sheriff.

Executed this day of

....., 19.....,
by leaving a copy of the within Summons
and Complaint with

Defendant.....

Sheriff.

The State of Alabama

.....COUNTY.

CIRCUIT COURT

Plaintiff.....

vs.

Defendant

Summons and Complaint

Filed this day of
....., 19.....

Clerk.

Plaintiff's Attorney.

The State of Alabama

.....COUNTY.

To the Sheriff ofCounty:

Whereas, the Plaintiff..... in the within
stated cause ha..... made affidavit and given
bond as required by law, you are hereby re-
quired to take the property mentioned in the
complaint into your possession, unless the
Defendant..... give..... bond payable to the
Plaintiff..... with sufficient surety in double
the amount of the value of the property,
with condition that if the Defendant.....

cost in the suit,.....
within thirty days thereafter, deliver the
property to the Plaintiff....., and pay all
costs and damages which may accrue from
the detention thereof.

....., Clerk.

IN ACCOUNT WITH

O'FARRELL FEED & SEED CO.

ATMORE, ALA.,

January 6,

195⁶⁰

Mr. B. T. Turner

Perdido, Alabama

Mar. 7. 1956-	5 Bu. Dixie 18 seed corn @ \$7.50	37.50
19	100# Cattail Millet seed	16.00
26	1 Ton Royster 4-10-7P/B @ 36.00	36.00
26	200# Cattail Millet seed	32.00
27	25 Bags Sco-co 4-10-7 @ 34.00	42.50
27	25 Bags Sco-co 4-10-7 @ 34.00	42.50
28	25 Bags Sco-co 4-10-7 @ 34.00	42.50
28	25 Bags Royster 4-10-7 @ 35.00	43.75
29	25 Bags Royster 4-10-7 @ 35.00	43.75
31	25 Bags Royster 4-10-7 @ 35.00	43.75
31	25 Bags Royster 4-10-7 @ 35.00	43.75
Apr. 2. 1956	25 Bags Sco-co 4-10-7 @ 34.00	42.50
2	100 # Cokers 100 Delinted Cotton Seed @ 20.50	20.50
2	20 Bags Sco-co 4-10-7 @ 34.00	34.00
3	25 Bags Sco-co 4-12-12 @ 39.00	48.75
3	25 Bags Sco-co 4-12-12 @ 39.00	48.75
9	2 Bu. Velvet Beans @ 10.00	20.00
14	300# Bahia Grass Seed	75.00
14	(Credit) Purchase order Bahia Grass seed	- 29.25
14	4½ Ton Sco-co 0-14-14 Bulk @ 34.00	153.00
14	Lime from Jeff Cochran	55.83
14	For hauling and spreading fertilizer	31.50

IN ACCOUNT WITH

O'FARRELL FEED & SEED CO.

ATMORE, ALA., _____ 195_____

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Apr. 16	100 # Cattail Millet seed @18¢	18.00
16	50# Bahia grass seed @ 25¢	12.50
24	1 Ton Nitrate of soda @ 60.00	60.00
24	80 Bu. Ogden Soybeans @4.00	320.00
24	40 Bu. Jackson soybeans @ 4/00	160.00
25	6 Ton Royster 4-10-7 @ 35.00 (Del'd)	210.00
25	4 Ton Royster 4-10-7 @ 35.00 (Del'd)	140.00
May 7	24 Bu. Ogden Soybeans @ 4.00	96.00
7	6-5 Bu. Size Soybean Inoculation @65¢	3.90
7	6 Ton International 4-10-7 @35.00	210.00
9	24 Bu. Ogden Soybeans @ 4.00	96.00
12	2 Bu. Arkansas Ogden soybeans @ 3.75	7.50
14	25 Bags Soda @ 60.00	75.00
15	1 Ton Royster 4-10-7 @ 35.00	35.00
15	10 Bu. Jacob Harta soybeans @4.00	40.00
15	25 Bags Nitrate of soda @3.00	75.00
15	90# Jacob Hartz Ogden soybeans @	6.00
16	25 Bags soda @ 3.00	75.00
17	5 Bags soda @ 3.00	15.00
17	10 Bags Royster 4-10-7 @ 35.00	17.50
19	6 Ton Sco-co 4-10-7 @ 35.00	210.00
21	30 Bu. Uncert. Jackson soybeans @ 3.75	112.50

IN ACCOUNT WITH

O'FARRELL FEED & SEED CO.

ATMORE, ALA.,

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May 22	10 Bu. Uncert. Jackson soybeans @ 3.75	37.50
23	15 Bags soda @ 3.00	45.00
June 2	24 Bu. Cert. Jackson soybeans @ 4.00	96.00
4	30 Bu. Cert. Jackson soybeans @ 4.00	120.00
August 30	100 Bu. Oats @ 1.25	125.00
Sept. 2	5 Tons Armour 4-10-7 @ 36.00 (Del'd)	180.00
<u>1959</u>		
Feb. 19	Paid on a/c	-1,000.00
March 6	4 Bu. Dixie 18 seed corn @ 10.00	40.00
11	12 Bags Sco-co 4-10-7 @ 37.50	22.44
19	4 Bu. Funks 740 seed corn @ 12.50	50.00
19	550# Cokers 100 cotton seed @ 17¢	93.50
26	25 Bags Sco-co 4-10-7 @ 35.65	44.50
27	18 Bags Armour 4-10-7 @ 35.65	32.04
27	7 Bags Royster 4-10-7 @ 35.65	12.46
27	1 Ton Royster 4-10-7 @ 35.65	35.65
April 1	3 Ton Sco-co 4-10-7 @ 35.65	106.95
4	3 Ton Sco-co 4-10-7 @ 35.65	106.95
6	25 Bags Royster 4-10-7 @ 35.65	44.50
6	1 Ton Sco-co 4-10-7 @ 35.65	35.65
8	3 Ton Sco-co 4-10-7 @ 35.65	106.95
2	2 Ton Royster 4-10-7 @ 35.65	71.30

IN ACCOUNT WITH

O'FARRELL FEED & SEED CO.

ATMORE, ALA., _____ 195_____

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April 9	2 Bu. Fla. 200 seed corn @ 9.00	18.00
9	250# Starr Millet @ 16¢	40.00
15	3 Ton Sco-co 4-10-7 @ 35.65	106.95
16	1 Bu. Fla. 200 seed corn @ 9.00	9.00
16	3 Tons Sco-co 4-10-7 @ 35.65	106.95
17	1 Ton Sco-co 4-10-7 @ 35.65	35.65
20	3 Ton Sco-co 4-12-12 @ 41.15	123.45
23	2 Ton Armour 4-12-12 @ 41.15	82.30
23	3 Ton Sco-co 4-12-12 @ 41.15	123.45
24	48 Bags Sco-co 4-12-12 @ 41.15	98.10
24	42 Bags Sco-co 4-12-12 @ 41.15	86.10
25	75 Bags Sco-co 4-12-12 @ 41.15	153.75
25	2 Ton Sco-co 4-12-12 @ 41.15	82.30
25	1 Ton Armour 4-12-12 @ 41.15	41.15
25	5 Bags Sco-co 4-12-12 @ 41.15	10.25
27	25 Bags Sco-co 4-12-12 @ 41.15	51.25
29	2½ Ton Sco-co 4-12-12 @ 41.15	102.87
29	25 Bags Sco-co 4-12-12 @ 41.15	51.25
May 1	40 Bu. Uncert. Ogden soybeans @ 3/50	140.00
1	25 Bags Sco-co 4-10-7 @ 35.65	44.50
1	12-5 Bu. size S/B Innoculation @ 65¢	7.80
1	1 Ton Sco-co 4-10-7 @ 35.65	35.65

IN ACCOUNT WITH

O'FARRELL FEED & SEED CO.

ATMORE, ALA.,

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May 2	25 Bags 4-10-7 @ 35.65	44.50
2	3 $\frac{1}{4}$ Tons Sco-co 4-10-7 @ 35.65	115.85
4	1 Ton Sco-co 4-12-12 @ 41.15	41.15
6	1 $\frac{1}{4}$ Ton Sco-co 4-10-7 @ 35.65	44.56
6	25 Bags Sco-co 4-10-7 @ 35.65	44.50
6	40 Bu. Cert. Ogden soybeans @ 3.70	148.00
7	25 Bags Sco-co 4-10-7 @ 35.65	44.50
7	25 Bags Sco-co 4-10-7 @ 35.65	44.50
8	25 Bags Sco-co 4-10-7 @ 35.65	44.50
8	25 Bags Sco-co 4-10-7 @ 35.65	44.50
8	40 Bu. Cert. Ogden soybeans @ 3.70	148.00
13	25 Bags Sco-co 4-10-7 @ 35.65	44.50
14	3 Ton Sco-co 4-10-7 @ 35.65	106.95
15	2 $\frac{1}{2}$ Ton Sco-co 4-10-7 @ 35.65	89.12
16	3 Ton Sco-co 4-10-7 @ 35.65	106.95
19	1 Bag Nitrate of soda @ 2.75	2.75
19	5-5 Bu. size S/B Inoculation @ 65¢	3.25
21	25 Bags Sco-co 4-10-7 @ 35.65	44.50
22	25 Bags Royster 4-10-7 @ 35.65	44.50
22	40 Bu. Cert. Ogden soybeans @ 3.70	148.00
22	4-5 Bu. size Inoculation @ 65¢	2.60
26	3 $\frac{1}{2}$ Tons Sco-co 4-10-7 @ 35.65	124.77

IN ACCOUNT WITH

O'FARRELL FEED & SEED CO.

ATMORE, ALA.,

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May 27	25	Bags Nit. of soda @ 55.00	68.75
28	3 $\frac{1}{2}$	Ton Sco-co 4-10-7 @ 35.65	124.77
28	25	Bags Ammonium Nitrate @ 3.90	97.50
June 3	1	Ton Ammonium Nitrate @ 78.00	78.00
4	19	Bags Nitrate of soda @ 55.00	52.25
4	1	Ton Nitrate of soda @ 55.00	55.00
5	1	Ton Sco-co 15-0-15 @ 65.00	65.00
5	1	Ton Ammonium Nitrate @ 78.00	78.00
6	2	Ton Nit. of soda @ 55.00	110.00
16	25	Bags Sco-co 15-0-15 @ 65.00	81.25
17	15	Bags Nit. of soda @ 55.00	41.25
18	25	Bags Nit. of soda @ 55.00	68.75
19	25	Bags Nit. of soda @ 55.00	68.75
24	25	Bags Sco-co 4-10-7 @ 35.65	44.50
24	3	Ton Sco-co 4-10-7 @ 35.65	106.95
25	25	Bags Sco-co 4-10-7 @ 35.65	44.50
26	2	Ton Sco-co 4-10-7 @ 35.65	71.30
26	2-2	Bu. Size S/B Imoculation @ 45¢	.90
29	18	Bags Nit. of soda @ 2.75	49.50
29	1	Bag Ammonium nitrate @ 3.90	3.90
July 1 (Credit)	16	Bu. Cert. Ogdens returned @ 3.70	59.20
2	1000#	3-10-0 Cotton poison @ 8 $\frac{1}{2}$ ¢	85.00

IN ACCOUNT WITH

O'FARRELL FEED & SEED CO.

ATMORE, ALA., _____ 195_____

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Aug. 21	500# Toxophane @ 9¢	45.00
Oct. 7	4 Ton Sco-co 4-10-7 @ 35.65	142.60
8	1 Ton Sco-co 4-10-7 @ 35.65	35.65
8	24 Bu. Cert. Bledsoe Wheat @ 4.25	102.00
7	Paid on a/c by soybeans	- 822.20
27	Check to you- Advance on beans	300.00
Dec. 12	Paid on a/c by soybeans	- 229.29
Oct. 8	68 Bu. seed oats @ 1.35	91.80
		<u>\$7,361.52</u>

STATE OF ALABAMA X
ESCAMBIA COUNTY X

Before me, the undersigned authority in and for aforesaid county and state, as a Notary Public under my seal of office, which seal of office is hereto attached, personally appeared Ardiel Morgan, known to me, who being by me first duly sworn, deposes and upon her oath stated that she is the bookkeeper for Mr. Talton O'Farrell a sole trader doing business as O'Farrell Feed & Seed Company, Atmore, Escambia County, Alabama, that as such she makes this affidavit; that she is familiar with the books and business of Talton O'Farrell, doing business as O'Farrell Feed & Seed Company, that the attached account against B. T. Turner, is just and correct, within the knowledge of this affiant; that she has authority to make this affidavit and that she has personal knowledge of the matters contained herein; that the items thereon stated and composing the said account were sold and delivered to the said B. T. Turner, at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful off-sets to which said account is entitled as thereon stated, and that the balance thereof, amounting to the sum of Seven Thousand Three Hundred Sixty One and 52/100 (\$7,361.52) Dollars, with interest from the 12th day of December, 1959, is justly due and remains unpaid.

X Ardiel Morgan

Sworn to and subscribed, acknowledged, signed and sealed before me, as a notary public under my seal of office, with my seal hereto affixed on this the 6 day of January, 1960.

A NOTARY PUBLIC IN AND FOR THE

STATE OF Alabama as large

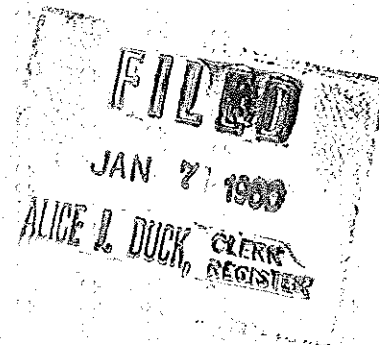
COUNTY OF _____

Paid
No. 4124

Galton O'Farrell
4/5/90 O'Farrell Fruit Seed Co

vs.

B. J. Turner



Received 7 day of Jan 1900
and on 12 day of Jan 1900
I served a copy of this writ on B. J. Turner
by service on _____

TAYLOR WILKINS, Sheriff
By W. A. Tolbert D. S.
Paid

Sheriff claims 26 miles at
Ten Cents per mile Total \$ 2 60
TAYLOR WILKINS, Sheriff
BY Tolbert
DEPUTY SHERIFF