

CIRCUIT COURT.

4148

THE STATE OF ALABAMA X

S U M M O N S.

BALDWIN COUNTY X

TO: ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

You are hereby commanded to summons Howard S. Turner, Vance T. Turner, Bynum Ezra Turner and B. T. Turner, individually and as Partners doing business as 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 (30) days from service hereof to the complaint of Talton O'Farrell, doing business as O'Farrell Feed and Seed Company.

Witness this 20 day of January, 1960.

Beulah Luck
CLERK.

Feb 15 1960

C O M P L A I N T.

TALTON O'FARRELL, DOING BUSINESS
AS "O'FARRELL FEED AND SEED
COMPANY."

PLAINTIFF.

VS.

HOWARD S. TURNER, VANCE T. TURNER,
BYNUM EZRA TURNER AND B. T. TURNER,
INDIVIDUALLY AND AS PARTNERS DOING
BUSINESS AS B. T. TURNER.

DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

LAW SIDE.

NUMBER: _____.

And the Plaintiff claims of the Defendants Seven Thousand Three Hundred Sixty One and 52/100 (\$7,361.52) Dollars due by the defendants to the Plaintiff on open account on to-wit; the 12th day of December, 1959, which said sum together with the interest thereon is due and unpaid.

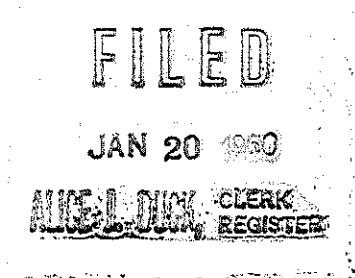
COUNT TWO.

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

HORNE, WEBB & TUCKER
BY:

Lawrence E. Horne
ATTORNEY'S FOR PLAINTIFF.

There is filed in this cause a sworn, verified, itemized statement of account of the Defendants with the Plaintiff and Plaintiff gives notice to the Defendants that the same will be used in evidence on the trial of this cause.



HORNE, WEBB & TUCKER
BY:

Frank E. Horne
ATTORNEYS FOR PLAINTIFF.

STATE OF ALABAMA X
ESCAMBIA COUNTY X

Before me, the undersigned authority in and for afore-
said 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 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 de-
livered to the said B. T. Turner, Vance T. Turner, Bynum Ezra
Turner or Howard S. Turner at the special instance and request of
the debtors 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.

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 8th day of January, 1960.

Inez White

A NOTARY PUBLIC IN AND FOR THE
STATE OF Alabama
COUNTY OF Escambia

Notary Public, State of Alabama at large
My commission expires August 15, 1961
Bonded by Employers Liability Assurance
Corporation



No. 4148.

Dalton O'Farrell

vs.

Howard S. Turney
et al.

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

Received 20 day of Jan 1960

and on 21 day of Jan 1960

I served a copy of the within & cc

on Howard S. Turney

Clance Turney

By service on Brynum & Co. Turney

B. S. Turney, Individually

TAYLOR WILKINS, Sheriff

By W. A. Talbert D. S.

Perdido

Received 20 day of Jan 1960

and on 21 day of Jan 1960

I served a copy of the within & cc

on Howard S. Turney

Clance Turney

By service on Brynum & Co. Turney

B. S. Turney & partners

TAYLOR WILKINS, Sheriff

By W. A. Talbert D. S.

Perdido

Sheriff claims 208 miles at

Ten Cents per mile Total \$ 20.80

TAYLOR WILKINS, Sheriff

BY Talbert

DEPUTY SHERIFF

To Judge Hall

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

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

TELEPHONE 49

March 3, 1960.

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

Dear Mrs Duck:

4148

This is to request that you enter on the record of the suit filed by this firm for Mr. Talton O'Farrell against Howard S. Turner, Vance T. Turner, Bynum Ezra Turner and B. T. Turner individually and as partners doing business as B. T. Turner that the plaintiff takes a voluntary non-suit.

If you will forward to this office or direct to Mr. O'Farrell at P.O. Box 237, Atmore the court costs in this cause Mr. O'Farrell will send you these costs by return mail.

With kindest personal regards I remain;

Very truly yours,

HORNE, WEBB & TUCKER

BY:

Douglas Webb

DOUGLAS S. WEBB

DSW/am.

off index

IN ACCOUNT WITH

O'FARRELL FEED & SEED CO.

ATMORE, ALA., January 15, 1950

Mr. B. T. Turner

Perdido, Alabama

1958		
Mar. 7	5 Bu. Dixie 18 seed corn @ 7.50	37 50
19	100# Cattail millet @ 16¢	16 00
26	1 Ton Royster 4-10-7 @ 36.00	36 00
26	2-100# Cattail millet @ 16.00	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	25 Bags Sco-co 4-10-7 @ 34.00	42 50
2	100# Cokers Delinted C/S @ 20 1/2¢	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	3-100# Behia grass seed @ 25.00	75 00
14	(Credit - Purchase Order-Behia grass seed)	29 25
14	4 1/2 Ton Sco-co 0-14-14, Bulk @ 31.00	153 00
14	Line from Jeff Cochran	55 83
14	For hauling and spreading fert. by Cochran	31 50
16	1-100# Cattail millet seed @ 18¢	18 00

O'FARRELL FEED & SEED CO.

ATMORE, ALA.,

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Apr. 16	50# Bahia Grass seed @25¢	12 50
24	1 Ton soda @ 60.00	60 00
24	80 Bu. Ogden Soybeans @ 4.00	320 00
24	40 Bu. Cert. Jackson S/B @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 Immoelation @ 65¢	3 90
7	6 Ton Int. 4-10-7 @35.00	210 00
9	24 Bu. Ogden S/B @ 4.00	96 00
12	2 Bu. Ark. Ogden S/B @ 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 Hartz S/B @ 4.00	40 00
15	25 Bags soda @ 3.00	75 00
15	90# 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 (Del'd)	210 00
21	30 Bu. Uncert. Jackson S/B @ 3.75	112 50
22	10 Bu. Uncert. Jackson S/B @ 3.75	37 50
23	15 Bags soda @ 3.00	45 00

O'FARRELL FEED & SEED CO.

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June 2	24 Bu. Cert. Jackson S/B @ 4.00	96 00
4	30 Bu. Cert. Jackson S/B @ 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
- 1959 -		
Feb. 19	(Credit - Paid on account) \$1,000.00	
Mar. 6	4 Bu. I/F 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# Gokers 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 Tons Sco-co 4-10-7 @ 35.65	106 95
9	2 Ton Royster 4-10-7 @ 35.65	71 30
9	2 TON Bu. Fla. 200 seed corn @ 9.00	18 00
9	250# Starr Millet seed @ 16¢	40 00
15	3 Ton Sco-co 4-10-7 @ 35.65	106 95

O'FARRELL FEED & SEED CO.

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April 16	1 Bu. Fla. 200 seed corn @ 9.00	9 00
16	3 Ton 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 @ 2.05	98 40
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	2 1/2 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 S/B @ 3.50	140 00
1	25 Bags Sco-co 4-10-7 @ 44.50 35.65	44 50
1	12-5 Bu. size Soybean Imoculation @ 65¢	7 80
1	1 Ton Sco-co 4-10-7 @ 35.65	35 65
2	25 Bags Sco-co 4-10-7 @ 35.65	44 50
2	3 20 Tons Sco-co 4-10-7 @ 35.65	115 85
4	20 Bags Sco-co 4-12-12 @ 41.15	41 15
6	1 1/2 Ton Sco-co 4-10-7 @ 35.65	44 56

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May	6	25 Bags Sco-co 4-10-7 @ 35.65	44 50
	6	40 Bu. Cert. Ogden @ 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 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 Soybean Innoc. @ 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 S/B @ 3.70	148 00
	22	4-5 Bu. Size Innoc. @ 65¢	2 60
	26	3 1/2 Ton Sco-co 4-10-7 @ 35.65	124 77
	27	25 Bags Nitrate of soda @ 55.00	68 75
	28	3 1/2 Ton Sco-co 4-10-7 @ 35.65	124 77
	28	25 Bags Ammon. Nitrate @ 3.90	97 50
June	3	1 Ton Ammon. Nitrate @ 78.00	78 00
	4	19 Bags Nitrate of soda @ 55.00	52 25

O'FARRELL FEED & SEED CO.

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June 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 Ammon. Nitrate @ 78.00	78 00
6	2 Ton Nitrate of soda @ 55.00	110 00
16	25 Bags Sco-co 15-0-15 @ 65.00	81 25
17	15 Bags Nitrate of soda @ 55.00	41 25
18	25 Bags Nitrate of soda @ 55.00	68 75
19	25 Bags Nitrate 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 3/8 Imco. @ 45¢	90
29	18 Bags soda @ 2.75	49 50
29	1 Bag Ammon. Nitrate @ 3.90	3 90
July 1	(Credit - 16 Bu. Cert. Ogden @ 3.70) =	\$59 20
2	1,000# 3-10-0 Cotton Poison @ 8½¢	85 00
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 seed @ 4.25	102 00
7	(Credit- Paid on a/c by Soybeans) -	822.20

O'TARRELL FEED & SEED CO.

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Oct. 27	Check to you (Advance on beans)	\$ 300 00
Dec. 12	(Credit- Paid on a/c by Soybeans)- 229 29	
Oct. 8	68 Bu. Seed Oats @ 1.35	91 80
		7,361.52