

S U M M O N S

41667

STATE OF ALABAMA:

COUNTY OF BALDWIN:

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

You are hereby commanded to summon PAUL CHILDRESS, JR.  
to appear in the Circuit Court of Baldwin County, Alabama, at  
the place of holding of same, and plead, answer or demur,  
within thirty days from service hereof, to the Complaint of  
JACOB VAN KAMPHUIS.

WITNESS my hand this 3 day of Apr A.D., 1961.

Arice French CLERK

C O M P L A I N T

JACOB VAN KAMPHUIS,	)	IN THE CIRCUIT COURT
Plaintiff,	)	OF BALDWIN COUNTY,
vs	)	ALABAMA
PAUL CHILDRESS, JR.,	)	AT LAW
Defendant.	)	CASE NO:

COUNT ONE

Plaintiff claims of the Defendant the sum of, to-wit,  
Seven Hundred and Seventy-one and 53/100 (\$771.53) Dollars,  
due by promissory note made by him on, to-wit, the 12th day  
of March, 1959, and payable and due on, to-wit, the 25th day  
of March, 1961, with interest thereon as provided therein, and  
Plaintiff further alleges that in said note the Defendant did  
agree to pay the original principal amount of to-wit, One Thousand  
Four Hundred Twenty-four and 27/100 (\$1424.27) Dollars in 23 equal  
consecutively monthly installments of to-wit, \$59.34 each, the

first installment being due and payable on, to-wit: the 25th day of April, 1959, all remaining installments being payable on the same date of each succeeding month thereafter and the final payment of to-wit, \$59.45 being due on, to-wit, the 25th day of March, 1961, with interest on each installment after maturity at the highest legal rate.

The Plaintiff further alleges that in said note the Defendant agreed, that in case default be made in payment of any installment at its maturity, all remaining installments shall, at the option of the legal holder of said note, become immediately due and payable. Plaintiff further avers that in said note the Defendant agreed in the event that said note is not paid according to its terms and is placed with an attorney for collection, the Defendant agreed to pay a reasonable attorney's fee, which said attorney's fee the Plaintiff claims and avers to be, to-wit, \$179.98. Plaintiff further alleges that Defendant failed to pay one of said monthly payments which was due and payable on, to-wit, the 25th day of January, 1960, and the Plaintiff declared the entire remaining balance of to-wit, \$771.53 of the principal of said note to become due and payable on said date, viz: the 25th day of January, 1960, with interest thereon as provided therein, hence this suit.

FOREMAN & BROWN,  
Attorneys for Plaintiff

BY William H. Card, Jr.  
William H. Card, Jr.

Defendant's address:

Post Office Box 195, Route  
Loxley, Alabama

4667

Jacob Van Kampen

vs

Paul Childress Jr

Received 3 day of April 1961  
and on 24 day of April 1961  
served a copy of the within  
on Paul Childress Jr

By service on

TAYLOR WILKINS, Sheriff  
By Edleigh Statham

Lovley, Ala

Sheriff claims 40 miles at  
Ten Cents per mile Total \$4.00  
TAYLOR WILKINS, Sheriff  
BY Statham  
DEPUTY SHERIFF

FILED  
APR 8 1961  
ALICE J. DUCK, CLERK  
REGISTER

<u>JACOB VAN KAMPHUIS,</u>  Complainant.  VS. <u>PAUL CHILDRESS, JR.</u>   Defendant.	}	IN THE CIRCUIT COURT  OF Baldwin <del>MOBILE</del> COUNTY, ALABAMA.  NO. <u>4667</u>
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### NON-MILITARY AFFIDAVIT

STATE OF ALABAMA }  
COUNTY OF ~~MOBILE~~ <sup>BALDWIN</sup> }

NOW comes, William H. Card, Jr.  
who being first duly sworn, deposes and says that the defendant herein, \_\_\_\_\_

was not at the time of the filing of this suit, and is not now in the Military or Naval Service of the United States.

The Defendant resides at Box 195, Route 1, Loxley, Alabama  
\_\_\_\_\_  
\_\_\_\_\_

*William H Card Jr*

Sworn to and subscribed before me,  
this 9th day of October  
1951

*James M. [Signature]*  
NOTARY PUBLIC, ~~MOBILE COUNTY, ALA.~~  
STATE OF ALA. AT LARGE  
FILED \_\_\_\_\_

REGISTER

4667

LAW OFFICES  
KEENER T. BLACKMARR  
Room 319-951 Government Street Building  
MOBILE, ALABAMA  
Telephone HE 2-0735

June 29, 1962

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

Re: Jacob Kamphuis v. Paul Childress, Jr.  
Case No. 4667  
Our File: 200-62-WHC

Dear Mrs. Duck:

Several weeks ago I requested that you issue an execution against the Defendant in the above-styled cause.

At this time I would like to inform you that I am no longer with the firm of Foreman & Brown, but am now associated with Keener T. Blackmarr.

I would appreciate your directing any correspondence in this matter directly to me at the above address. Foreman & Brown no longer have an interest in this matter.

Yours very truly,

LAW OFFICES OF KEENER T. BLACKMARR

  
William H. Card, Jr.

WHC:sk

cc: Sheriff of Baldwin County