

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon AMELIA T. JENKINS to appear within thirty days from the service of this writ in the Circuit Court of said county at the place of holding same, then and there to answer the complaint of MALBIS PLANTATION, INC., a corporation.

WITNESS my hand this 13 day of June, 1962.

Alice J. Duck
Clerk of the Circuit Court

Defendant's address:
Jenkins Farm
Loxley, Alabama

* * * * *

MALBIS PLANTATION, INC.,
a corporation,

Plaintiff,

VS.

AMELIA T. JENKINS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

NO. 5172

COMPLAINT

The plaintiff claims of the defendant the sum of THREE HUNDRED THIRTY-ONE DOLLARS (\$331.00) due from her by account on, to-wit, April 30, 1961, which sum of money with the interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is hereto attached, marked Exhibit A and made a part hereof.

J. B. Blachman
Attorney for plaintiff

FILED
JUN 13 1962
ALICE J. DUCK, CLERK
REGISTER
64-6-1562

EXHIBIT A

Amelia T. Jenkins
Jenkins Farm
Loxley, Alabama

IN ACCOUNT WITH
MALBIS PLANTATION, INC.
DAPHNE, ALABAMA

1-8-53	Annual rent, Green's Place, 78 acres @ \$7.00		\$ 546.00
7-21-54	Payment received	\$ 50.00	
11-12-54	Payment received	100.00	
1-18-55	Payment received	25.00	
4-30-61	Payment received	<u>40.00</u>	
		\$ 215.00	<u>215.00</u>
	Balance due, not including interest. . . .		\$ 331.00

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, within and for said County in said State, personally appeared Peter Frankos, who, after being by me first duly and legally sworn, deposes and says: That he is President of Malbis Plantation, Inc., a corporation, and as such officer is duly authorized to make this affidavit for and on behalf of the said corporation; that he has personal knowledge of the attached and foregoing account, and that it is true, correct, justly due and unpaid.

Peter Frankos

Sworn to and subscribed before me
on this the 8th day of June, 1962.

Mary Lou Blackburn

Notary Public, Baldwin County, Alabama

SUMMONS AND COMPLAINT

MALBIS PLANTATION, INC., a corporation,
ation,

Plaintiff,

VS.

AMELIA T. JENKINS,

Defendant.

Received 24 day of June 1962
and on 15th day of June 1962
I served a copy of the within of & C
on Amelia T. Jenkins

By service on

TAYLOR WILKINS, Sheriff
By Lud Seibert D. S.,
Malbis

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

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5172

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA