

John Spielvogel,
Plaintiff,

vs

Circuit Court, Baldwin County, Alabama.

Elberta Realty Company,
a Corporation,
Defendant.

CAUSE OF ACTION:

- 1) Plaintiff claims of the Defendant the sum of Eight Hundred (\$800.00) Dollars due by account, on to-wit: The 23rd day of September 1914
 - 2) Plaintiff claims of the Defendant the sum of Eight Hundred (\$800.00) Dollars due by account stated between the Plaintiff and the Defendant on to-wit: The 23rd day of September 1914
 - 3) Plaintiff further claims of the Defendant the sum of Eight Hundred (\$800.00) Dollars for money had and obtained on to-wit: The 23rd day of September 1914
 - 4) Plaintiff further claims of the Defendant the sum of Eight Hundred (\$800.00) Dollars Damages for that, that heretofore, on ~~XXX~~²³ to-wit: The 23rd day of September 1914 the said Defendant, acting through its Agent L. Lindorfer obtained from the Plaintiff the sum of Eight Hundred (\$800.00) Dollars, lawful money, on and under the pretence, that within a short time from that date, the Defendant would deliver to Plaintiff a warranty Deed to the following described Real Estate: The East 10 acres of lot 1, in section 29, township 7, Range 5 East, of Baldwin County, Alabama.
- Plaintiff alleges, that Defendant has failed to deliver to Plaintiff the said Deed, to the Damages of Plaintiff, and wherefore the Plaintiff sues, together with interest since the 23rd day of September 1914
- 5) Plaintiff claims of the Defendant the sum of Eight Hundred (\$800.00) Dollars, which sum, the Defendant obtained from the Plaintiff on to-wit: The 23rd day of September 1914, as the purchase price for ten acres of land, and which land, the Defendant has failed to deliver to Plaintiff.

All of which sums, are still due and unpaid, and claimed by Plaintiff, together with interest thereon since the 23rd day of September 1914


Attorney for Plaintiff.

SUMMONS AND COMPLAINT

The State of Alabama {
Baldwin County } No.

Circuit Court

May 5th, 1916.

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon Elberta Realty Company, a Corporation,

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 them the Defendant 'S

by

John Spielvogel, Plaintiff

Witness my hand this 5th, day of May 1916.

D. W. Reel Clerk.

COMPLAINT

Plaintiff Versus

The plaintiff claims of the defendant

.....Dollars due by

Plaintiff's Attorney.

Original

STATE OF ALABAMA,
BALDWIN COUNTY.
CIRCUIT COURT

John Spielvogel.

vs. Plaintiffs

Elberta Realty Company,

a Corporation.

Defendants

SUMMONS AND COMPLAINT

May 5th, 1916

T.W. Richerson, Clerk

Defendant lives at

G.H. Kruempel.

Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette

Received in office

May 5th, 1916

Sheriff

I have executed this Writ

this *16th day May* 1916

by leaving a copy of the within summons and complaint with

L. Lindorfer
Agent

L. E. Eubanks Sheriff

By Ryand Roberts Deputy Sheriff.

John Spielvogel
No. 1290. 105

Elbert Realty Corp.,
a corporation

Current Report
No. 1290. 105
Fall Term 1916

We appear for the defend-
ent in this case and plead the
general issue, and the defendant
in this case demands a verdict
a jury

Chas. D. Cox
Erwin T. Meade
Attorneys for Defd.