

1048

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT --- LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Herron Steadham to appear within thirty days from the service of this Writ in the Circuit Court to be held for said county at the place of holding same, then and there to answer the Complaint of Peoples Fertilizer Company, A Corporation.

Alice J. Duck
Clerk

COMPLAINT.

PEOPLES FERTILIZER COMPANY, A Corporation.

Plaintiff

-vs-

HERRON STEADHAM

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

The Plaintiff claims of the defendant One Hundred Forty-seven and 20/100 Dollars (\$147.20) due by Promissory note made by him on, to-wit: April 2, 1945, and payable on, to-wit: June 1, 1945, with interest thereon.

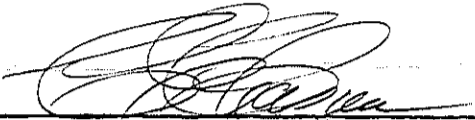
Plaintiff avers that in and by the terms of said note the Defendant waived as to this debt all right to exemption under the constitution and laws of Alabama or any other state as to personal property and of this waiver the Plaintiff now claims the benefit.

The Plaintiff avers that in and by the terms of said note the defendant agreed to pay all costs of collecting or securing or attempt to collect or secure said note, including a reasonable attorney's fee, and the Plaintiff further claims of the defendant the further and additional sum of \$25.00 as such reasonable attorney's fee.

COUNT II

The Plaintiff claims of the defendant One Hundred Eighteen and 25/100 Dollars (\$118.25) for merchandise, goods, and chattels sold

by the Plaintiff to the Defendant on to-wit: April 2, 1945 and on to-wit: April 19, 1945, which sum of money with the interest thereon is still unpaid.



Attorney for Plaintiff

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SUMMONS AND COMPLAINT

PEOPLES FERTILIZER CO.
A Corporation,
Plaintiff

-VS-

HERRON STEADHAM
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

FILED

MAR 21 1947

ALICE J. DUCK, Clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

Received in Sheriff's Office
this 22 day of Mar, 1947
TAYLOR WILKINS, Sheriff

Executed by 3-25 1947
copy of within Summons and
on
Herron Steadham

Taylor Wilkins Sheriff
A. F. Hall Deputy Sheriff

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