

BEDDOW, EMBRY & BEDDOW

ATTORNEYS AT LAW

SUITE 1632

TWENTY-ONE TWENTY-ONE BUILDING

2121 8TH AVENUE, NORTH

BIRMINGHAM 3, ALABAMA

PHONE ALPINE 1-6203

RODERICK BEDDOW
T. ERIC EMBRY
RODERICK BEDDOW, JR.
RODERICK M. MACLEOD
J. SCOTT VOWELL

January 29, 1963.

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

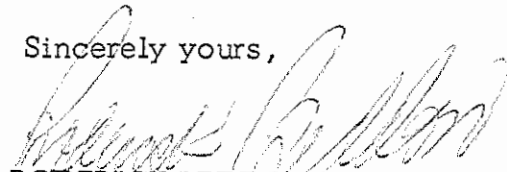
Dear Mrs. Duck:

Re: No. 5418 Watts v. Harden.

Enclosed herewith you will find an appearance in the
above styled case.

I think of you good people down there very often and
I hope that the day is not too distant when I shall have the
pleasure of visiting with you and other of my friends there.

Sincerely yours,


RODERICK BEDDOW.

RB/f
Enc.

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA
P. O. DRAWER 150

February 28, 1963

Hon. H. M. Hall
Judge of Circuit Court
Bay Minette, Alabama

Re: Callie Mai Watts

Vs: Will M. Harden

Case No. 5418

Dear Judge Hall:

Mr. Roderick Bellow, Sr. of Birmingham, and I had about five telephone conversations concerning this case, the most recent being this morning and we have agreed upon the following:


1. That we are to enter a judgment today in favor of Mrs. Callie Mai Watts on a promissory waive note, with the defendant paying the court costs, which note is dated September 28, 1959 in the principal amount of \$2,500, due September 28, 1960, at six per cent (6%) per annum, from date, said note provides for reasonable attorney's fees.

2. The judgment to be for \$3,250, will be due and payable as follows: \$500 due and payable on or before April 1, 1963, and \$100 due and payable on or before June 1, July 1, August 1, September 1, October 1, November 1 and December 1, 1963. No payments shall be required during the months of January, February or March of each year, but \$100 is due and payable on or before April 1 through December 1 of each and every year until the total judgment is paid, with 6% interest on the judgment and the defendant paying the court costs.

3. Should the defendant fail to make the payments as aforesaid, levy of execution may be made for the balance due on said judgment.

The original note is attached.

Cordially yours,


FOREST A. CHRISTIAN

W. B. Bellow

February 13, 1963

Beddow, Embry & Beddow
Attorneys at Law
2121 8th Avenue, North
Birmingham 3, Alabama

Gentlemen:

Re: Callie Mae Watts
vs: Will M. Harden

The above styled case was set for hearing on the 13th day of February, 1963, but due to the fact that you had not been notified, the case has been re-set for hearing Wednesday, February 20, 1963, and this is your notice of said setting.

Yours very truly,

Clerk

cc: Hon. F.A. Christian
Foley, Alabama

C O P Y

BEDDOW, EMBRY & BEDDOW

ATTORNEYS AT LAW

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RODERICK BEDDOW
T. ERIC EMBRY
RODERICK BEDDOW, JR.
RODERICK M. MACLEOD
J. SCOTT VOWELL

January 30, 1963.

Hon. Forrest A. Christian,
Attorney at Law,
Bay Minette, Alabama.

Dear Sir:

Re: Max Harden.

I failed to add the P.S. to Mr. Beddow's letter
of January 29th, therefore I am sending it to you herein,
as follows:

If you contemplate coming to Birmingham within the
immediate future please advise me the time and hour you will
be here. If not on my next trip to Mobile, Montgomery or
any county contiguous to your County I will make my
arrangements so as to permit me to meet with you there.

R. Beddow.

*case was set for
Wed Feb 13 but was continued to*

*case set
Wed Feb. 20*

Janice P. Coleman

57418

*Callie Mae Watts
vs.*

Will M. Harden

Write Feb - 13 - 1963

*cc
F. A. Christian
Bay Minette, Ala.*

LAW OFFICE OF
FOREST A. CHRISTIAN
P. O. BOX 190
FOLEY, ALABAMA

February 12, 1963

Hon. H. M. Hall
Judge of Circuit Court
Bay Minette, Alabama

Re: Callie Mai Watts
Vs: Will M. Harden, also known as
Max Harden
Case No. 5418

Dear Judge Hall:

Kindly render a judgment in this case based on a promissory
waive note in the amount of \$3,500, which includes interest and
attorney's fee.

Cordially yours,



FOREST A. CHRISTIAN

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY,)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon WILL M. HARDEN, also known as MAX HARDEN, 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, Alabama, at the place of holding same by CALLIE MAI WATTS.

Witness my hand this the day of December, 1962.

Clerk

COMPLAINT

CALLIE MAI WATTS,

PLAINTIFF

VS:

WILL M. HARDEN, also known
as MAX HARDEN,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

The Plaintiff claims of the Defendant TWO THOUSAND FIVE HUNDRED AND 00/100 (\$2,500.00) DOLLARS, due by promissory note made by R. E. HARDEN and endorsed by WILL M. HARDEN, also known as MAX HARDEN, on the 28th day of September, 1959, and payable on or before one year from date, with interest thereon.

Said note provides for a reasonable attorney's fee, which Plaintiff alleges to be FIVE HUNDRED AND 00/100 (\$500.00) DOLLARS.

James C. ...

Attorney for Plaintiff

The Defendant's address is:

THE STATE OF ALABAMA X
BALDWIN COUNTY. X

CALLIE MAI WATTS, X
PLAINTIFF, X

vs X

WILL M. HARDEN, also
known as MAX HARDEN,
DEFENDANT. X

IN THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA.

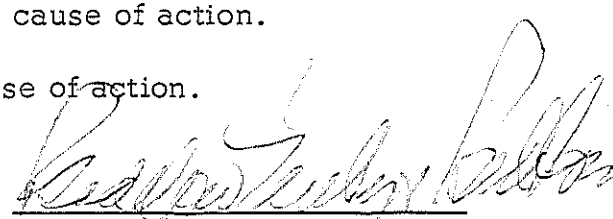
AT LAW.

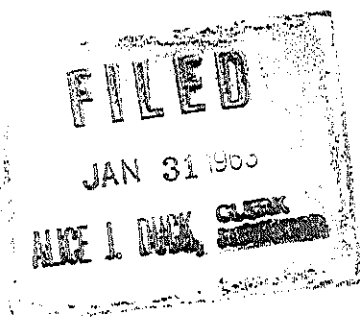
No. 5418.

DEMURRER:

Comes the defendant in the above styled cause and demurs to the plaintiff's complaint and to each count thereof separately and severally, and as grounds therefor sets down and assigns the following, separately and severally:

1. The allegations of said complaint are vague, indefinite and uncertain.
2. The allegations of said count are mere conclusions of the pleader.
3. Said complaint fails to state a cause of action.
4. Said count fails to state a cause of action.


BEDDOW, EMBRY & BEDDOW
Attorneys for Defendant.



No. 5418 IN THE CIRCUIT COURT
OF BALDWIN COUNTY.

CALLIE MAI WATTS,

Plaintiff

vs

WILL M. HARDEN, also known
as MAX HARDEN

Defendant.

DEMURRER

BEDDOW, EMBRY & BEDDOW
ATTORNEYS FOR DEFENDANT.

no copy filed.

SUMMONS

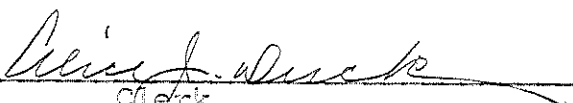
THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon WILL M. HARDEN, also known as MAX HARDEN, 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, Alabama, at the place of holding same by CALLIE MAI WATTS.

Witness my hand this the 22 day of December, 1962.


Clerk

COMPLAINT

CALLIE MAI WATTS,	:	
	:	
PLAINTIFF	:	
	:	IN THE CIRCUIT COURT OF
VS:	:	
	:	BALDWIN COUNTY, ALABAMA
WILL M. HARDEN, also known	:	
as MAX HARDEN,	:	AT LAW
	:	
DEFENDANT	:	

The Plaintiff claims of the Defendant TWO THOUSAND FIVE HUNDRED AND 00/100 (\$2,500.00) DOLLARS, due by promissory note made by R. H. HARDEN and endorsed by WILL M. HARDEN, also known as MAX HARDEN, on the 28th day of September, 1959, and payable on or before one year from date, with interest thereon.

Said note provides for a reasonable attorney's fee, which Plaintiff alleges to be FIVE HUNDRED AND 00/100 (\$500.00) DOLLARS.


Attorney for Plaintiff

The Defendant's address is:

64-1-3-62

Received 27 day of Dec. 1962
and on _____
I served a copy of the within S. & C.
on Will M. Harden
By service on _____
TAYLOR WILKINS, Sheriff
By _____ D. S.

EXECUTED this the _____
day of JAN 3 1963
by leaving a copy of the within with
Will M. Harden also
known as Max Harden
HOLT A. McDOWELL, Sheriff
Jefferson County, Alabama
By H. E. Moore

Holt A. McDowell, Sheriff of
Jefferson County, Alabama,
claims \$1.50 each for serving
1 process(es) and \$1.00
travel expense on each of
1 process(es) or a total of
\$ 2.50
H. E. Moore
Deputy Sheriff.

Baldwin
MD. 5416

577-8076

SUMMONS AND COMPLAINT

GALLIE MAE WATTS,

PLAINTIFF

VS:

WILL M. HARDEN, also known as
MAX HARDEN,

DEFENDANT

507 West 12th St.
Bham, Ala.

~~FILED~~

FILED
DEC 27-62
ALICE I. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA