

COOTS CHAIN SAW CO.,  
By Robert E. Coots, Jr.,  
Owner,

Plaintiff,

Vs

EARL A. BRYARS, Jr.,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW,

Case No. 4811

COUNT ONE:

The Plaintiff claims of the Defendant One Hundred Ninety-Two and 98/100 (\$192.98) Dollars, due by promissory note made by him on the 7th day of January, 1961 and payable on the 18th day of March, 1961, with interest thereon.

Plaintiff further avers that in, by and as a part of said promissory note the Defendant agreed to pay all costs of collecting or securing or attempting to collect or secure this note, including a reasonable attorney's fee, and the Plaintiff further avers and claims of the said Defendant the further and additional sum of Thirty eight and 60/100 (\$38.60) Dollars as a reasonable attorney's fee.

Plaintiff further alleges that in, by and as a part of the said note, the Defendant waive demand, presentment, protest, notice of protest, and all rights of exemption under the Constitution and the Laws of the State of Alabama, and of this waiver, the Plaintiff now claims the benefit.

Defendant's Address:  
Perdido, Alabama

Kenneth Cooper  
Attorney for Plaintiff

FILED

AUG 10 1961

ALICE J. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

August-----TERM, 1961

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Earl A. Bryars, Jr.

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 said Earl A.

Bryars, Jr.,

Defendant.

by Coots Chain Saw Co., by Robert E. Coots, Owner,

Plaintiff.

Witness my hand this 10 day of August, 19 61

Alice J. Duck, Clerk  
Alice J. Duck

No. 4811

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# STATE of ALABAMA

Baldwin County

## CIRCUIT COURT

COOTS CHAIN SAW CO., BY

Robert E. Coots, Owner

Plaintiffs

vs.

EARL A. BRYARS, Jr.

Defendants

### Summons and Complaint

FILED

Filed

19

AUG 10 1961

ALICE J. DOCK,

CLERK  
REGISTER

Clerk

Kenneth Cooper

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office 9/25/61

8/10, 1961

Sheriff.

I have executed this summons

this

1961

by leaving a copy with

Earl Bryars Jr.

Returned 11 day of Sept  
Not found in my county after diligent search and in-  
Sherry-  
BY Taylor Wilkins Sheriff  
W. O. Sarnes Deputy Sheriff

Ten Cents per mile. Total \$ 2.60

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins  
W. O. Sarnes

Sheriff.

Deputy Sheriff.

perido