

COMPLAINT

E. B. SPARKMAN, d/b/a LESSEE  
GULF ICE AND COLD STORAGE COMPANY,

PLAINTIFF

VS:

EARL BLACKWELL AND OPAL BLACKWELL

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO.

4846

The Plaintiff claims of the Defendant the sum of One Hundred Thirty-two and 86/100 (\$132.86) Dollars, due by promissory note made by the Defendants on the 2nd day of March 1961, and payable on the 1st day of April 1961, with interest from August 1, 1960, at the rate of 6% per annum.

Plaintiff avers that in and by the terms of said note the Defendants waived all right to exemption under the constitution and laws of the State of Alabama, and of this waiver Plaintiff now claims benefit.

Plaintiff further avers that in and by the terms of said note, the Defendants agreed to pay all cost of collecting or securing, or attempting to collect or secure said note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendants the further and additional sum of Twenty-five and NO/100 (\$25.00) Dollars, as such reasonable attorney's fee.

  
Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. \_\_\_\_\_

\_\_\_\_\_ TERM, 19\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Earl Blackwell and Opal Blackwell

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 \_\_\_\_\_

Earl Blackwell and Opal Blackwell Defendant S.

by \_\_\_\_\_

E. B. Sparkman, d/b/a Lessee, Gulf Ice & Cold Storage Co., Plaintiff \_\_\_\_\_

Witness my hand this 30 day of Aug 1961

Earl 9-1-61

Theresa Duck, Clerk

**STATE of ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

E. B. Sparkman d/b/a Lessee

Gulf Ice & Cold Storage Co.

Plaintiffs

vs.

Earl Blackwell and Opal Blackwell

Defendants

**Summons and Complaint**

**FILED**

Filed AUG 30 1961 19\_\_

ALICE J. DUCK CLERK  
REGISTER

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley, Alabama

Received In Office

8/30, 1961

Sheriff.

I have executed this summons

this Sept 1 1961

by leaving a copy with

Earl Blackwell  
and Opal Blackwell

Sheriff claims 144 miles at

Ten Cents per mile Total \$14.40

TAYLOR WILKINS, Sheriff

BY Charles E. Chidley  
DEPUTY SHERIFF

James A. Brice  
Sheriff.

Charles E. Chidley  
Deputy Sheriff.

Foley