

COMPLAINT

BON SECOUR FISHERIES, INC., a corporation,

PLAINTIFF

VS:

EARL BLACKWELL AND OPAL BLACKWELL,
DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 4848

The Plaintiff claims of the Defendants the sum of Two Thousand and Eight Hundred Six and 22/100 (\$2,806.22) Dollars, due by promissory note made by the Defendants on the 2nd day of March 1961, and payable on April 1, 1961, with interest from June 24, 1960, at the rate of six (6%) per cent 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 Defendant the further and additional sum of Five Hundred Sixty and NO/100 Dollars (\$560.00), as such reasonable attorney's fee.

James A. [Signature]
Attorney for Plaintiff

FILED

MAR 30 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. _____

_____ 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 _____

Bon Secour Fisheries, Inc., a corporation _____, Plaintiff

Witness my hand this 30 day of Aug 19 61

W. J. Duck _____, Clerk

Exp 9-1-61

No. 4848

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STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Bon Secour Fisheries, Inc.,

a corporation

Plaintiffs

vs.

Earl Blackwell and Opal Blackwell

Defendants

Summons and Complaint

Filed

FILED

19

AUG 30 1961

Clerk

**ALICE J. DUCK, CLERK
REGISTER**

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

19

by leaving a copy with

Earl Blackwell and
Opal Blackwell

Sheriff claims

1.44

miles at

Ten Cents per mile Total \$

14.40

BY Taylor Wilkins Sheriff

DEPUTY SHERIFF

Taylor Wilkins
Deputy Sheriff

Sheriff.

Deputy Sheriff.