

4930

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 HAROLD LEHMAN to appear within thirty (30) 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 H. KENNEDY,

WITNESS my hand this the 2 day of Nov 1961

Beijing J. Houch
Clerk

H. KENNEDY,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	LAW SIDE
HAROLD LEHMAN,)	
Defendant.)	


COUNT 1

The Plaintiff claims of the Defendant NINE THOUSAND FIVE HUNDRED TWENTY-SIX and 39/100 DOLLARS (\$9,526.39) due by Promissory Waive Note made by him, on, to wit, June 15, 1960, payable in annual installments of ONE THOUSAND FIVE HUNDRED EIGHTY-SEVEN and 73/100 DOLLARS (\$1,587.73), plus interest at the rate of six per cent (6%) per annum from date on the 31st day of December, 1960 and the 31st day of each succeeding December thereafter, which sum of money with the interest thereon, after allowing a credit of TWO HUNDRED THIRTY-SIX and 27/100 DOLLARS (\$236.27) on interest, is still due and unpaid.

The Plaintiff avers that in and by the terms of said note the Defendants waived all rights of exemption under the Consti-

tution and Laws of Alabama and any other State, as to personal property, and of this waiver the Plaintiff now claims the benefit.

The Plaintiff further avers that in and by the terms of said note the Defendants agreed to pay all costs of collecting or securing, or attempting to collect this note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendants the further and additional sum of ONE THOUSAND FIVE HUNDRED DOLLARS (\$1,500.00) as such reasonable attorney's fee.



Attorney for Plaintiff

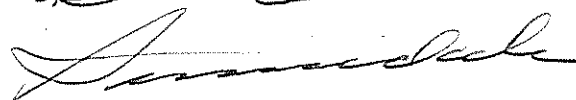
FILED

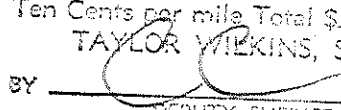
NOV 2 1961

ALICE J. DUCK, CLERK
REGISTER

Received 2 day of Nov 1961
and on 4 day of Dec 1961
I served a copy of the within Dec
on Donald L. Luman
By service on _____

TAYLOR WILKINS, Sheriff
BY  U. S.



Sheriff claims 60 miles at
Ten Cents per mile Total \$ 6.00
TAYLOR WILKINS, Sheriff
BY 
DEPUTY SHERIFF

4938

SUMMONS AND COMPLAINT

OF

H. KENNEDY, Plaintiff,

Vs.

HAROLD LEHMAN, Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

FILED

NOV 2 1961

ALICE I. DUCK, CLERK
REGISTER

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA