

ERNEST M. BAILEY
ATTORNEY AT LAW
221 FAIRHOPE AVE.
FAIRHOPE, ALABAMA

BOX 161

November 22, 1963

Mrs. Alice J. Duck,
Clerk of Circuit Court
Bay Minette, Alabama

Re: Bedsole Dry Goods Co.,
vs. Vann York

Dear Mrs. Duck:

I will appreciate you having service made
on the enclosed Bill of Complaint.

Thanking you in advance, I am

Very truly yours,

Ernest M. Bailey
Ernest M. Bailey (sgw)
EMB/w

Incls: Original & 1 copy of
Complaint

110.5837

STATE OF ALABAMA)
COUNTY OF BALDWIN)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon VANN YORK to appear and answer, plead or demur, within thirty days from the service of this writ, to a Bill of Complaint filed against him in Circuit Court, at Law, for said County and State by Bedsole Dry Goods Co., a Corporation, and at the same time and place you are to make return of your actions hereunder.

Given under my hand and seal this the 16 day of November, 1963.

Defendant resides at
115 Nichols St., Fairhope, Ala.

[Signature]
CLERK OF COURT

BEDSOLE DRY GOODS, CO., a
Corporation,

Plaintiff

-vs-

VANN YORK,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

705837

COUNT ONE:

The Plaintiff claims of the Defendant the sum of \$359.48, due by promissory note made by him on to-wit: February 2, 1963, which sum of money, with interest thereon, is still due and unpaid; and Plaintiff avers that in and by the terms of said note, Defendant waived all rights of exemption under the laws of the State of Alabama, and the Plaintiff claims of the Defendant the additional sum of \$80.00 as attorney's fees for bringing this suit for that the Defendant in and by the terms of said note agreed to pay a reasonable attorney's fee and Plaintiff avers that said amount is a reasonable attorney's fee for the bringing and prosecuting of this suit.

[Signature]
SOLICITOR FOR PLAINTIFF

E-4-12-3-63

70.5837

BILL OF COMPLAINT

ived 25 day of Nov. 1943
on 3rd day of Dec 1943
ved a copy of the within 84c
Vann York
ervice on _____

TAYLOR WILKINS, Sheriff

By Leibert D. S.

F. Hope

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY Red Leibert
DEPUTY SHERIFF.

BEDSOLE DRY GOODS CO., a
Corporation,

Plaintiff

-vs-

VANN YORK, Nichols
115 Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Ernest M. Bailey, Attorney
for Plaintiff