

CECIL G. CHASON

ATTORNEY-AT-LAW
FOLEY, ALABAMA

November 14, 1964

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

16300

Dear Mrs. Duck:

Enclosed herewith is Summons & Complaint in the
case of W. Max Griffin vs J. W. Bain to be served.

Yours very truly,


C. G. Chason

CGC:dc

Encls.

M. 6300

Send
back
to Sher.

contact
C. R. Chason

STATE OF ALABAMA)
) . . IN THE CIRCUIT COURT . . LAW SIDE
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon J. W. BAIN 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 W. MAX GRIFFIN.

WITNESS my hand this the 16 day of November, 1964.

Deirdre J. French
Clerk

COMPLAINT

W. MAX GRIFFIN,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
)	
VS:)	BALDWIN COUNTY, ALABAMA
)	
J. W. BAIN,)	LAW SIDE
)	
Defendant.)	

COUNT I

The Plaintiff claims of the Defendant TWO THOUSAND, NINE HUNDRED TWENTY-SEVEN and 50/100 DOLLARS (\$2,927.50) due by Promissory Waive Note made by him on, to wit, December 6, 1961, and due and payable ninety (90) days after date, plus interest at the rate of eight per cent (8%) per annum from date until paid, which sum of money with interest thereon is still due and unpaid.

The Plaintiff avers that in and by the terms of said note Defendant waived all rights of exemption under the Constitution and Laws of the State of Alabama or 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 Defendant agreed to pay all cost of collecting or

COUNT II

[Signature]
Attorney for Plaintiff

Please send to Foley Deputy
for service.

WILLIAMSON & CO., LTD.

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SECRET

BY EDWIN COLEMAN

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JAN 16 1954

[illegible]

SUMMONS & COMPLAINT

* * * * *

W. MAX GRIFFIN,

Plaintiff,

VS

J. W. BAIN,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALEDWIN COUNTY, ALA.

LAW SIDE.

* * * * *

STATE OF ALABAMA)
) . . IN THE CIRCUIT COURT . . LAW SIDE
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon J. W. BAIN 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 W. MAX GRIFFIN.

WITNESS my hand this the 16 day of November, 1964.


Clerk

COMPLAINT

W. MAX GRIFFIN,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
)	
VS:)	BALDWIN COUNTY, ALABAMA
)	
J. W. BAIN,)	LAW SIDE
)	
Defendant.)	6300

COUNT I

The Plaintiff claims of the Defendant TWO THOUSAND, NINE HUNDRED TWENTY-SEVEN and 50/100 DOLLARS (\$2,927.50) due by Promissory Waive Note made by him on, to wit, December 6, 1961, and due and payable ninety (90) days after date, plus interest at the rate of eight per cent (8%) per annum from date until paid, which sum of money with interest thereon is still due and unpaid.

The Plaintiff avers that in and by the terms of said note Defendant waived all rights of exemption under the Constitution and Laws of the State of Alabama or 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 Defendant agreed to pay all cost of collecting or

securing, or attempting to collect or secure this note, including reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of FOUR HUNDRED FIFTY & 00/100 DOLLARS (\$450.00) as such reasonable attorney's fee.

COUNT II

The Plaintiff claims of the Defendant ONE THOUSAND, FOUR HUNDRED SEVENTY-SIX & 91/100 DOLLARS (\$1,476.91) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant from the first day of February, 1962 through the 17th day of September, 1962, which sum of money with interest thereon is still unpaid.


Attorney for Plaintiff

Please send to Foley Deputy
for service.

FILED

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N.F.

SUMMONS & COMPLAINT

W. MAX GRIFFIN,

Plaintiff,

VS

J. W. BAIN,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

Received 13 day of Jan 1967

and on _____ day of _____ 19____

I served a copy of the within _____

on J. W. Bain

By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

Returned 30 day of Sept 1966

Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff

By Carlisle Children

Deputy Sheriff

March
10
Carlisle Children
Deputy Sheriff