

62956

JAMES W. HOWELL
ATTORNEY AT LAW
P. O. BOX 205 — PHONE WH 3-3602
FOLEY, ALABAMA

January 5, 1965

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

Enclosure--Summons and Complaint--Peoples Fertilizer Company
vs
J. W. Kinsey, Jr.

PEOPLES FERTILIZER COMPANY,	)	IN THE CIRCUIT COURT OF
	)	
PLAINTIFF,	)	BALDWIN COUNTY, ALABAMA
	)	
-vs-	)	AT LAW, NO. <u>6256</u>
	)	
J. W. KINSEY, JR.,	)	
	)	
DEFENDANT.	)	

COUNT ONE

Plaintiff claims of the Defendant the sum of FIVE HUNDRED SIXTY-SEVEN & 34/100 DOLLARS (\$567.34) due from him by promissory note executed on, to-wit, the 12th day of August, 1958, which sum of money with interest thereon is still due and unpaid.

Plaintiff claims the benefit of waiver of exemptions made in said promissory note by Defendant.

Plaintiff further claims of the Defendant the sum of ONE HUNDRED THIRTEEN & NO/100 DOLLARS (\$113.00) as a reasonable attorney's fee, which said attorney's fee Defendant agreed in said promissory note to pay.


 Attorney for Plaintiff

FILED
 JAN 8 1965
 ALICE L. DICK

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon J. W. KINSEY, JR.

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.....

..... J. W. KINSEY, JR., Defendant.....

by

..... PEOPLES FERTILIZER COMPANY Plaintiff.....

Witness my hand this 4 day of Jan 1964

Wesley Duck Clerk

64-1-11-65

No. 6356

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

PEOPLES FERTILIZER COMPANY

Plaintiffs

vs.

J. W. KINSEY, JR.

Defendants

SUMMONS AND COMPLAINT

Filed 1-8 1965

Cliff J. Howell Clerk

James W. Howell

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley, Alabama

Received In Office

1/8 1965

Sheriff

I have executed this summons

this Jan 11 1965

by leaving a copy with

J. W. Kinsey Jr

72
720

DEPUTY

James W. Kinsey Sheriff
Charles L. Kinsey Deputy Sheriff

Foley

JAMES W. HOWELL
ATTORNEY AT LAW
P. O. BOX 206 — PHONE WH 3-3602
FOLEY, ALABAMA

February 19, 1965

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

Re: Peoples Fertilizer Company
Vs: J. W. Kinsey, Jr.
Case No. 6356

Dear Mrs. Duck:

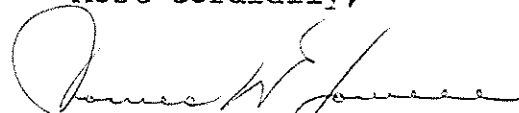
On February 18, 1965, Judge Mashburn granted a judgment for the Plaintiff in the above case.

The note, which was the basis for the suit is enclosed herewith. Please issue a judgment according to the following figures:

Principal Balance	\$567.34
Interest	175.84
Attorney Fee	<u>113.47</u>
	\$856.65

Thank you for your usual prompt attention to this request.

Most cordially,


James W. Howell

JWH:j
Enclosure