

6512

BELLAS HESS SUPER STORES, INC.)	
OF MOBILE, a Corporation,)	IN THE CIRCUIT COURT OF
Plaintiff,)	
vs.)	BALDWIN COUNTY, ALABAMA
JAMES B. JOINER,)	LAW SIDE.
Defendant.)	

COUNT ONE:

The Plaintiff claims of the Defendant, the sum of FOUR HUNDRED SIX AND 08/100 DOLLARS (\$406.08) due from him by account between the Defendant and the Plaintiff on the 28th day of September, 1963, which sum of money, with interest thereon, is still unpaid, and is the property of the Plaintiff.

COUNT TWO:

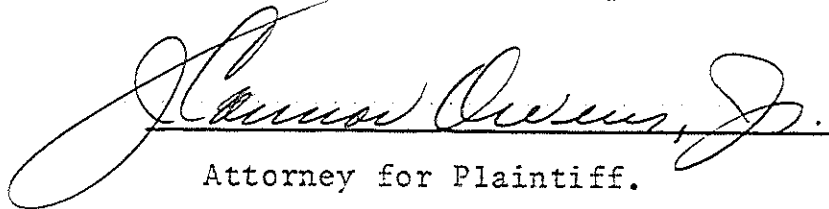
The Plaintiff claims of the Defendant FOUR HUNDRED SIX AND 08/100 DOLLARS (\$406.08), due from him on account stated between the Defendant and the Plaintiff on the 11th day of January, 1965, which sum of money, with interest thereon is still unpaid, and is the property of the Plaintiff.

COUNT THREE:

The Plaintiff claims of the Defendant, the sum of ONE HUNDRED TWENTY NINE AND 60/100 DOLLARS (\$129.60) for merchandise, goods and chattels sold by the Plaintiff to the Defendant, under conditional sales contract dated, on to-wit, December 21, 1963, for the total purchase price of ONE HUNDRED EIGHTY AND 35/100 DOLLARS (\$180.35). Plaintiff avers that said merchandise was delivered to the Defendant and that there remains a balance due and unpaid under said contract of the sum of ONE HUNDRED TWENTY NINE AND 60/100 DOLLARS (\$129.60), together with interest thereon at the rate of eight percent (8%) per annum.

Plaintiff alleges that the Defendant agreed in writing, as contained in said conditional sales contract, to waive all rights.

and claims to personal property as exempted to him under the laws of this State or any other State, and Plaintiff claims the benefit of said waiver. Plaintiff further alleges that Defendant agreed, in the event that it was necessary for the Plaintiff to hire an attorney to collect this claim, to pay all costs of collection, including a reasonable attorney's fee, and Plaintiff claims the further and additional sum of TWENTY FIVE DOLLARS (\$25.00), as a reasonable attorney's fee in the premises.


Attorney for Plaintiff.

FILED

MAY 19 1945

ALICE L. DUCK, CLERK
REGISTER

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 JAMES B. JOINER

ROUTE I, BOX 195

BAY MINETTE, ALABAMA

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..... James B.
Joiner....., Defendant.....

by BELLAS HESS SUPER STORES, INC., OF MOBILE, a corporation,

..... Plaintiff.....

Witness my hand this..... day of..... May 1965

..... Clerk

67-5-11-65

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STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

BELLAS HESS SUPER STORES,
INC., OF MOBILE, a corporation

Plaintiffs

vs.
JAMES B. JOINER,

Defendants

SUMMONS AND COMPLAINT

Filed May 11 1965

Reice J. Luck Clerk

J. Connor Owens
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route 1, Box 195
Bay Minette, Ala.

Received In Office

May 11 1965

....., Sheriff

I have executed this summons

this May 11 1965
by leaving a copy with

James B Joiner

Sheriff claims 20 miles at
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY W. A. Solbert
DEPUTY SHERIFF

Taylor Wilkins Sheriff
W. A. Solbert Deputy Sheriff

White house Fork