

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

3931

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James Leo Shutt and Earl L. Blackwell to appear and answer, plead or demur, within thirty days from the date hereof of this service, to a Bill of Complaint filed against them in Circuit Court, at Law, for said County and said State by Joe Hipsh.

Herein fail not. Due return make of this writ as the law directs.

Witness my hand this the 4 day of August, 1959.

David J. Black
CLERK OF COURT

JOE HIPSH,
Plaintiff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

versus

AT LAW

JAMES LEO SHUTT and
EARL L. BLACKWELL,
Defendants

COUNT ONE:

Plaintiff claims of Defendants the sum of \$900.00, due by promissory note made by them on, heretofore, to-wit: The 12th day of August, 1958, which sum of money, with interest thereon, is due and unpaid; and Plaintiff avers that in and by the terms of said note, the Defendants waived all rights of exemption under the laws of the State of Alabama, and Plaintiff claims the benefit of said waiver; Plaintiff claims the additional sum of \$180.00 as a reasonable sum as attorney fees for bringing this suit for that the Defendants in and by the terms of said note agreed to pay a reasonable attorney fee, and Plaintiff avers that said amount is a reasonable attorney fee for the bringing and prosecuting of this suit.

Edward M. Bailey
ATTORNEY FOR PLAINTIFF

No 3931

JOE HIPSH,

PLAINTIFF

VS.

JAMES LEO SHUTT and
EARL L. BLACKWELL,

DEFENDANTS

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

DEFENDANTS CAN BE SERVED AT:
FOLEY, ALABAMA

FILED

AUG 6 1959

ALICE J. DUCK, CLERK
REGISTER

Received 6 day of July 1959
and on 15 day of May 1959
served a copy of the within 1590
in (1) James Leo Shutt
Earl L. Blackwell
by service on _____

TAYLOR WILKINS, Sheriff
By Charles J. Blackwell

2- Foley
1- Bon Secour

Sheriff claims 158 miles at
Ten Cents per mile; Total \$ 15.80
TAYLOR WILKINS, Sheriff
BY CC
DEPUTY SHERIFF