GORDON & JANSEN ATTORNEYS AT LAW 1607-1610 MERCHANTS NATIONAL BANK BUILDING A. FLETCHER GORDON VERNOL R. JANSEN, JR. MOBILE II, ALABAMA OF COUNSEL: ROBERT E.GORDON April 16, 1954 1325 DAUPHIN STREET Mrs. Alice J. Duck, Clerk Circuit Court of Baldwin County BayiMinette, Alabama Cobb Barret Motors, Inc. v. James H. Clark Dear Mrs. Duck: We acknowledge receipt of your notice that the Sheriff had made return on the original complaint and summons in this matter with the endorsement "not found in my county". We are calling on our clients for their assistance and will appreicate your holding the file in suspension until we can accumulate sufficient additional evidence to enforce the claim. Very truly yours, GORDON & JANSEN VRJjr/pjb

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GORDON & JANSEN
ATTORNEYS AT LAW
1607-1610 MERCHANTS NATIONAL BANK BUILDING
MOBILE 11, ALABAMA
March 8, 1954

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

Dear Mrs. Duck:

We enclose herewith original and one copy of summons and complaint which we desire to file in your Court.

Will you please acknowledge receipt of these papers and advise us when the defendant has been served with process.

Very truly yours,

GORDON & JANSEN

VRJjr/pjb Encls.

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Obb. Barret Brotons

J. H. Clark

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Tŀ	ıe l	State	of	Alabama,

Baldwin County.

Circuit Court, Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon J. H. Clark

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. H. Clark

\_\_\_\_\_, Defendant\_\_\_

Cobb\_Barret Motors, Inc., a corporation

Plaintiff

Witness my hand this 10th day of March 19 54

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	Plaintiff's Attorney	-			<u> </u>	Sheriff
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	Defendant's Attorney		(			Deputy Sheriff

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COBB-BARRET MOTORS, INC., a corporation,

Pleintiff.

-VS-

J. H. CLARK,

Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.
AT LAW.

CASE	MO.	

# COUNT ONE

Plaintiff claims of the Defendant the sum of Eighty-Four and 69/100 (\$84.69) Dollars due by promissory notes made by him on to-wit: the 26th day of September, 1952, the 14th day of October, 1952, and the 22nd day of November, 1952, together with interest thereon; and Plaintiff claims of the Defendant the additional sum of Fifteen (\$15.00) Dollars for the defendant in and by the terms of said note, agreed to pay a reasonable attorney's fee for collection or attempt to collect said note, and Plaintiff avers that said amount is a reasonable attorney's fee for bringing this suit; and Plaintiff further avers that in any by the terms of said note, defendant waived all rights of exemption under the Constitution and laws of the State of Alabama, and Plaintiff claims the benefit of said waiver.

### COUNT TWO

Plaintiff claims of the Defendant the sum of One Hundred Fifteen and 68/100 (\$115.68) Dollars due from him by contract of conditional sale, executed by him on to-wit: January 22, 1952, which sum of money, together with the interest thereon, is still due and unpaid; and Plaintiff claims of the Defendant the additional sum of Twenty-Five (\$25.00) Dollars for the defendant in and by the terms of said contract, agreed to pay a reasonable attorney's fee for collection or attempt to collect, and Plaintiff avers that said amount is a reasonable attorney's fee for bringing this suit; and Plaintiff further avers that in and by the derms of said contract, defendant waived all rights of exemption under the Constitution and laws of the State of Alabama, and Plaintiff claims the benefit of said waiver.

Solution FOR PLAINTIFF

DEFENDANT'S ADDRESS: Bayminette, Alabama STATE OF ALABAMA ) (
COUNTY OF BALDWIN)

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. H. CLARK to appear within thirty days from service of this process in the Circuit Court of Baldwin County, Alabama, at the place of holding same, then and there to answer the complaint of Cobb-Barret Motors, Inc.

witness: Alice J. Duck, Clerk of said Court, this pot day of Thursh, 1954.

Attest: Accept de Clerk:

\* \* \* \* \* \*

#### SHERIFF'S RETURN

	Received day	of _	, 1954,	and on	day
of _		, 1954, I ser	ved a copy o	f the withir	e complaint
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CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commended to summer I I. CLAIK to apper within thirty days from service of this process in the Circuit Court of Baldwin County, Alabama, at the place of holding same, then and there to enswer the complaint of Gobb-Barret Motors, Inc.

Alice J. Duck, Clerk of said Court, this 10 2 day

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COBB-BARRET MOTORS, INC., a corporation,

Plaintiff,

-vs-

J. H. CLARK,

Defendant.

IN	THE	CIRC	UIT	COURT	OF
BAI	DWII	I COU	NTY.	, ALAB	AMA.
ΑT	LAW				

CA	SE	NO	).

### COUNT ONE

Plaintiff claims of the Defendant the sum of Eighty-Four and 69/100 (\$84.39) Dollars due by promissory notes made by him on to-wit: the 26th day of September, 1952, the 14th day of October, 1952, and the 22nd day of November, 1952, together with interest thereon; and Plaintiff claims of the Defendant the additional sum of Fifteen (\$15.00) Dollars for the defendant in and by the terms of said note, agreed to pay a reasonable attorney's fee for collection or attempt to collect said note, and Plaintiff avers that said amount is a reasonable attorney's fee for bringing this suit; and Plaintiff further avers that in any by the terms of said note, defendant waived all rights of exemption under the Constitution and laws of the State of Alabama, and Plaintiff claims the benefit of said waiver.

### COUNT TWO

Plaintiff claims of the Defendant the sum of One Hundred Fifteen and 68/100 (\$115.68) Dollars due from him by contract of conditional sale, executed by him on to-wit: January 22, 1952, which sum of money, together with the interest thereon, is still due and unpaid; and Plaintiff claims of the Defendant the additional sum of Twenty-Five (\$25.00) Dollars for the defendant in and by the terms of said contract, agreed to pay a reasonable attorney's fee for collection or attempt to collect, and Plaintiff avers that said amount is a reasonable attorney's fee for bringing this suit; and Plaintiff further avers that in and by the derms of said contract, defendant waived all rights of exemption under the Constitution and laws of the State of Alabama, and Plaintiff claims the benefit of said waiver.

ATTORNEYS FOR PLAINTIFF

STATE OF ALABAMA ) COUNTY OF BALDWIN)

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. H. CLARK to appear within thirty days from service of this process in the Circuit Court of Baldwin County, Alabama, at the place of holding same, then and there to answer the complaint of Cobb-Barret Motors, Inc.

Witness: Alice J. Duck, Clerk of said Court, this 10th day of March, 1954.

Attest: Reset - neue Clerk:

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No2207 Page	Defendant lives at
The State of Alabama Baldwin County	
CIRCUIT COURT	Received In Office
COBB-BARRET MOTORS, INC.	11 1954
a corporation	Sherif
Plaintiffs	I have executed this summons
vs.	this19
J. H. CLARK	by leaving a copy with
Defendants	
Summons and Complaint	
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and Clerk	
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Plaintiff's Attorney	Sheri
Defendant's Attorney	Deputy Sheri:
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The State of Alabama, Baldwin County.	Circuit	Court, Baldwin C	ounty
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ANY SHERIFF OF THE STAT			
appear and plead, answer or demur, or Circuit Court of Baldwin County, S	tate of Alabama, at Bay Mine	te, against	
J. H. Cl	ark		Defendant
Cobb_Bar			
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			_, Plaintiff