

The State of Alabama

BALDWIN

County

CIRCUIT COURT

3254

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon Otis Cooley and Marie Cooley,
jointly, and individually,

to appear before the Circuit Court of Baldwin County, Alabama, at the place
of holding the same and plead, answer or demur within thirty days from service hereof to the complaint
of J. C. McDavid

Witness, my hand this 27 day of May 19 57.

Clerk.

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN
THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT.

COMPLAINT

J. C. McDavid

VS.

Otis Cooley and MarieCooley, jointly, and OtisCooley, individually and MarieCooley, individually Defendant

Plaintiff

The Plaintiff claims of the Defendant s Otis Cooley and Marie Cooley

Three hundred sixty-five and 16/100 (\$365.16)-----Dollars, due
due by promissory note made by them on the 28th day of
February, 1957, and payable in 13 installments of \$25.00
and 1 installment of \$40.16, the first installment
due March 15, 1957, and the remaining installments due
on corresponding day of each successive month for the
said number of 14 installments.

Plaintiff further alleges that in and by the terms of
said note, the failure to pay one installment accelerates
the payment of the remaining installments.

Plaintiff further alleges that in and by the terms of said
note, defendants waived all rights of homestead exemption
as to personal property and the plaintiff claims the right
of said waiver.

Plaintiff further alleges that in and by terms of said
note, the defendants agreed to pay all costs of collection,
including a reasonable attorney's fee, and the plaintiff
claims the sum of \$54.00 as a reasonable attorney's fee
in the premises.

James Owens, Jr.
ATTORNEY FOR PLAINTIFF