

CECIL G. CHASON

ATTORNEY-AT-LAW
FOLEY, ALABAMA

May 28, 1957

3257

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

Dear Mrs. Duck:

Enclosed herewith is Summons and Complaint in the suit of
Foley Hardware Company, a partnership composed of Max
Lawrenz and Margaret Swain -vs- Hurley Bishop.

Yours very truly,


C. G. Chason

CGC:fm

encls. 2

STATE OF ALABAMA)
BALDWIN COUNTY) IN THE CIRCUIT COURT . . LAW SIDE . .

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon Hurley Bishop to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of Foley Hardware Company, a partnership.

WITNESS my hand this the 29 day of May, 1957.

Arice J. Duke
Clerk

- COMPLAINT -

FOLEY HARDWARE COMPANY, a
partnership composed of Max
Lawrenz and Margaret Swain,
Plaintiff,

-vs-

HURLEY BISHOP,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE


COUNT I

The Plaintiff claims of the Defendant Four Hundred Twenty-one and 40/100 Dollars (\$421.40), due by Chattle Mortgage Waive Note, made by him on, to-wit, February 4, 1955, with interest at the rate of seven per cent (7%) per annum being due and payable from Feburary 4, 1956.

The Plaintiff avers that in and by the terms of said note the Defendant waived all rights of exemption under the Consitution and Laws of Alabama, as to personal property, and of this waiver the Plaintiff now claims the benefit.

The Plaintiff further avers that in and by the terms of said note the Defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure this note, in -

cluding a reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of Eighty-five Dollars (\$85.00) as such reasonable attorney's fee.


Attorney for Plaintiff

Defendant's address is
Fairhope, Alabama

Received 29 day of May 1952
and on 27 day of June 1957
served a copy of the within s/c.
Hurley Bishop
by service on _____

TAYLOR WILKINS, Sheriff
By Edlough Steadham D. S.

Fairhope

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Steadham
DEPUTY SHERIFF

Fairhope
No. 3257

SUMMONS AND COMPLAINT

FOLEY HARDWARE COMPANY, a
partnership composed of Max
Lawrenz and Margaret Swain,

Plaintiff,

-VS-

HURLEY BISHOP,

Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

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FILED
MAY 29 1957
ALICE L. DICK, Clerk
CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA