

MORGAN PLAN COMPANY, INC.,
A Corporation,

Plaintiff,

vs.

C. M. NORTHCUTT,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

NO. 3282.

DEMURRER:

Now comes the Defendant in the above styled cause and for demurrer to the complaint, assigns separately and severally, the following:

1. It does not state a cause of action.

J. B. Blackburn
Attorney for Defendant.

Defendant demands a trial of
this cause by jury.

J. B. Blackburn
Attorney for Defendant.


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 C. M. Northcutt to appear within thirty 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 Morgan Plan Company, Inc., a corporation.

Witness my hand this 9 day of July, 1957.


Clerk

MORGAN PLAN COMPANY, INC.,
A Corporation,

Plaintiff,

vs.

C. M. NORTHCUTT,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendant Eight Hundred Seventy-seven and 44/100 Dollars (\$877.44) due by promissory note made by him on the 9th day of November, 1950, and payable on the 10th day of May, 1954, with interest thereon.

The Plaintiff further alleges that in and by the terms of said promissory note the Defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure said note, including a reasonable attorneys fee, whether the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant the sum of One Hundred Seventy-five Dollars (\$175.00) as such reasonable attorney's fee.

The Plaintiff further alleges that in and by the terms

of said note the Defendant waived as to the debt evidenced thereby all right of exemption under the Constitution and Laws of Alabama, or any other state and the Plaintiff does hereby claim the benefits of such waiver.

CAFFEY, GALLALEE & CAFFEY

and

CHASON & STONE

By:



Defendants address is
Route 1, Robertsdale,
Alabama.

served a copy of the within 810
on C. M. Northcutt

By service on _____

TAYLOR WILKINS, Sheriff
By [Signature] D. S.

Rosinton

Sheriff claims 52 miles at
Ten Cents per mile Total \$ 5.20
TAYLOR WILKINS, Sheriff
BY Childress
DEPUTY SHERIFF

RECORDED No. 3282

MORGAN PLAN COMPANY, INC.,
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Plaintiff,

vs.

C. M. NORTHCUTT,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

FILED
JUL 9 1957
ALICE A. BUCK, Clerk
LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA