

SUMMONS AND COMPLAINT

The State of Alabama,
Baldwin County. } No.

CIRCUIT COURT.

Term, 191

To any Sheriff of the State of Alabama:

You are hereby commanded to summon

A BIEGANOWSKI

to appear at the next term of the Circuit Court to be held for said County at the place of holding the same, then and there to answer the complaint of

PEOPLES FERTILIZER COMPANY a CORPORATION

Witness my hand, this 17th day of

1917

Rch
J W Richardson Clerk

K
COMPLAINT

PEOPLES FERTILIZER COMPANY
A CORPORATION

A BIEGANOWSKI

Plaintiffs vs.

Defendants

The plaintiff claim of the defendant

One Hundred and Forty Five & 28/100ths Dollars, due
due by promissory note made by defendant to plaintiff on Feby. 11th.

1915, ~~with interest~~ due and payable on or before Nov. 1st. 1915

at Baldwin County Bank with interest from Maturity.

The plaintiff further claims of defendant the further sum of Eighty Four
& 50/100ths Dollars due by promissory note made by defendant to plaintiff on Feby. 24th. 1915 and due and payable at Baldwin County Bank
on or before Nov. 1st. 1915 with interest from maturity.

Plaintiff further claims of defendant the further sum of Twenty Seven
& 62/100ths Dollars as a reasonable attorneys fee which defendant agreed
to pay in above two notes, and plaintiff alleges that defendant waived
his exemptions as to personal property as to the payment of the two
above notes.

John H. Stoll
Plaintiffs Attorney S

F 1417

ORIGINAL.

No.

The State of Alabama,
Baldwin County.

CIRCUIT COURT.

PEOPLES FERTILIZER COMPANY

vs. Plaintiffs.

A BIEGANOWSKI

Defendants.

SUMMONS AND COMPLAINT.

Filed 9/17 1917

J. W. Rutherford Clerk.

Defendant lives at

Plaintiff's Attorney.

Defendant's Attorney.

THE BALDWIN TIMES PRINT

Received in office

Sept 17 1917

Cleubanks Sheriff

I have executed this Writ

this Oct 18 1917

by leaving a copy of the within summons and complaint with

A Biegansowski

Cleubanks Sheriff

Deputy Sheriff