

SUMMONS AND COMPLAINT.

STATE OF ALABAMA.)  
BALDWIN COUNTY.)

CIRCUIT COURT-BALDWIN COUNTY, ALABAMA.  
FALL TERM-1917.

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon Charles Koier 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, Alabama, at Bay Minette, against Charles Koier, Defendant, by People's Fertilizer Company, a Corporation, Plaintiff.

Witness my hand this the 8 day of October, 1917.

T. V. Riccio CLERK.

C-O-M-P-L-A-I-N-T.

PEOPLE'S FERTILIZER CO.,)  
a corporation. )  
Plaintiff. )

-VS-

( CHARLES KOIER,  
(  
( Defendant.

The Plaintiff claims of the Defendant the sum of One Hundred and Thirty-eight Dollars and forty-four cents, together with interest thereon, it being balance due on the following promissory notes;

One Crop-lien note Numbered #52, dated Feb. 9th, 1914, for the sum of \$107.05, due Nov. 1st, 1914, witnessed by H. M. Low, signed by Charles Koier and payable to Peoples Fertilizer Co., or order.

One crop-lien note Numbered 595, dated Feb. 24th, 1915, for the sum of \$95.98, due June 1st, 1915, witnessed by H. M. Low, signed by Charles Koier and payable to Peoples Fertilizer Co., or order.

One crop-lien note numbered 596, dated Feb. 24th, 1915, for the sum of \$64.40, due Nov. 1st, 1915, witnessed by H. M. Low, signed by Charles Koier and payable to Peoples Fertilizer Co., or order.

One crop-lien note, numbered #479, for the sum of \$25.25, dated 9/14, 1914, due Feb., 1st, 1915, witnessed by C. H. Low, signed by Charles Koier and payable to Peoples Fertilizer Co., or order.

One hundred and Thirty-eight dollars and forty-four cents, with interest thereon, being the balance due on said notes above set out.

The Plaintiff alleges that in and by said notes the Defendant agreed to pay a reasonable attorney's fee for the securing or collecting the indebtedness secured by them if not paid at maturity, the Plaintiff claims the further sum of \$20.75 as such reasonable attorney's fee.

The Plaintiff further alleges that in and by said notes the Defendant waived all his rights to exemptions under the laws of the United States and the State of Alabama, of which waiver the Plaintiff now claims the benefit.

Stone & Stone,

By M. H. Stone

ATTORNEY'S FOR PLAINTIFF.

*Original*

Summons and complaint.

CORCUI COURT-BALDWIN COUNTY.  
-FALL TERM, 1917-

Peoples' Fertilizer Co., (inc.)  
Plaintiffs,

vs.  
Charles Koier,  
Defendant.

SUIT ON NOTES.

Stone & Stone,  
Attorneys for Pltff.

Filed Oct 8<sup>th</sup>, 1917.  
R. W. Dickinson  
Clerk.

*Rec in office Oct 8<sup>th</sup> 1917 and received  
Oct 15<sup>th</sup> 1917 serving a copy of the  
within summons and complaint on  
Charles Koier*

*C. E. Centurico Sheriff*