

MRS. BIRDIE CRUM DOWELL,
Complainant.

VS.

W. S. CRUZAN,
Defendant.

The plaintiff, formerly Birdie Crum, now Mrs. Birdie Crum Dowell, claims of the defendant the sum of One Hundred Dollars (\$100.00), due by promissory note, made by him on, towit, the 15th day of January, 1912, and payable to the order of Birdie Crum on, towit, one year after date, with interest at 6% per annum, which sum of money with the interest thereon is due and unpaid.

The plaintiff further alleges that the note is a waive exemption note to personal property, that the maker waives demand, presentment, protest, notice of protest and all other requirements necessary to hold him. Plaintiff further alleges that the note provides for the payment of a reasonable attorneys' fee, which fee will be Twenty Dollars (\$20.00).

Thompson & Foster
Attorneys for Complainant

Defendant's address:

Bromley, Alabama.

The State of Alabama
Baldwin County

No. _____

Circuit Court

Fall Term, 1917

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon W.S. Cruzan

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, State of Alabama, at Bay Minette, against him

the Defendant. by _____

Mrs. Birdie Crum Dowell

Plaintiff

Witness my hand this 16 day of June 1917

T. W. Reardon Clerk.

Complaint

Plaintiff Versus _____

The plaintiff claims of the defendant _____

Dollars due by _____

Plaintiff's Attorney.

Original

No. 1st

State of Alabama
Baldwin County

CIRCUIT COURT

Mrs. Birdie Crum Dowell

vs.

Plaintiff

W.S. Cruzan

Defendant

Summons and Complaint

Filed June 16th 1917

W. W. Williams Clerk

Defendant lives at

Plaintiff's Attorney

Defendant's Attorney

Times Print—Bay Minette.

Received in office

June 16th 1917

A. E. Eubanks Sheriff

I have executed this Writ

this 26th Oct 1917

by leaving a copy of the within summons and complaint with

W. S. Cruzan

A. E. Eubanks Sheriff.

Deputy Sheriff.

The State of Alabama
Baldwin County

No.

Circuit Court

Fall Term, 1917

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Complaint

Plaintiff Versus

The plaintiff claims of the defendant

Dollars due by

Plaintiff's Attorney.

Mrs. Birdie Crum Dowell,
Complainant.

vs

W. S. Cruzan,
Defendant.

Circuit Court, Baldwin
County, Alabama.

The defendant for answer to the complaint saith
he is not guilty of the matters alleged therein.

W. S. Cruzan,

City Bank and Trust Co.
MOBILE, ALABAMA.

\$100.

One Year

MOBILE, ALA.

Jan. 15-

1912

AFTER DATE, WITHOUT GRACE, I

PROMISE TO PAY TO

THE ORDER OF

Birdie Grimes

One Hundred

Interest at 6% per annum.

DOLLARS

FOR VALUE RECEIVED. PAYABLE AT THE City Bank and Trust Co., in Mobile, Ala.

THE PARTIES TO THIS INSTRUMENT, WHETHER MAKER, ENDORSER, SURETY, OR GUARANTOR, EACH FOR HIMSELF, HEREBY SEVERALLY AGREES TO PAY THIS NOTE AND WAIVES, AS TO THIS DEBT, ALL RIGHT OF EXEMPTION UNDER THE CONSTITUTION AND LAWS OF ALABAMA, OR ANY OTHER STATE, AND THEY EACH SEVERALLY AGREE TO PAY ALL COSTS OF COLLECTING, OR SECURING, OR ATTEMPTING TO COLLECT OR SECURE THIS NOTE, INCLUDING A REASONABLE ATTORNEY'S FEE, WHETHER THE SAME BE COLLECTED OR SECURED BY SUIT OR OTHERWISE, AND THE MAKER, ENDORSER, SURETY OR GUARANTOR OF THIS NOTE SEVERALLY WAIVES DEMAND, PRESENTMENT, PROTEST, NOTICE OF PROTEST, SUIT AND ALL OTHER REQUIREMENTS NECESSARY TO HOLD THEM.