

Foley Fertilizer Company,
a corporation,

Plaintiff,

Vs.

J.J.Middleton and A.J.Middleton,
Defendants.

Circuit Court of

Baldwin County, Ala.

Fall Term 1918.

COMPLAINT.

1. The Plaintiff claims of the defendants forty-one & 50/100 Dollars due by promissory note made by them on the 17th, day of February, 1914, and payable to Plaintiff on the 1st, day of November 1914, which sum of money with the interest thereon is still unpaid.
2. Plaintiff claims of the defendants Ninety-five & 50/100 Dollars due by promissory note made by them on the 24th, day of March 1914, and payable to Plaintiff on the 1st, day of November 1914, which sum of money with the interest thereon is still unpaid.

And plaintiff avers that in each of said notes and as a part of the consideration thereof, the defendants expressly waived in writing all of their right to exemptions under the Constitution and laws of the State of Alabama, and of the United States, and agreed to pay an attorney's fee of 10% for collecting or securing same if not paid when due; and plaintiff hereby claims the sum of Twenty-six & 85/100 Dollars as such attorney's fees.

Chas Hall

Gordon Edington

Attorneys for Plaintiff.

S. J. & A. J. Middleton

Filed 10/10/918
T. M. McQuinn
Clerk

92
10/10/918
T. M. McQuinn
Clerk

The State of Alabama
Baldwin County

No.

Circuit Court

Fall

Term, 1918

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon.....J.J.Middletori and A.J.Middletori.....

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Cir-
cuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....them.....

the Defendant..... by Foley Fertilizer Company, a Corporation,.....

Plaintiff

Witness my hand this 10th day of October 1918

Clerk.

Complaint

Plaintiff Versus

The plaintiff claims of the defendant

Dollars due by

Plaintiff's Attorney.

Original 1st

RECORDED

No.

State of Alabama
Baldwin County

CIRCUIT COURT

Foley Fertilizer Co., a
Corporation.

vs.

Plaintiffs

J. J. Middleton and A. J.
Middleton.

Defendants

Summons and Complaint

Filed October 10th 1918

J. W. McCombs

Clerk.

Defendant lives at

Daphne, Ala.

Chas. Hall, Gordon and Edgington.

Plaintiff's Attorney

Defendant's Attorney

Times Print—Bay Minette.

Received in office

October 10th, 1918

C. E. Eubanks

Sheriff

I have executed this Writ

this Oct 21st 1918

by leaving a copy of the within summons and complaint with

J. J. Middleton and
A. J. Middleton

C. E. Eubanks

Sheriff.

Deputy Sheriff.

\$ 41.50

Foley, Ala.,

2/17

191 4

On or before Nov 1st 191 4 I or we, promise to pay THE FOLEY FERTILIZER CO., or order Forty one and 50/100 Dollars for value received, negotiable and payable at Foley, for Bags OLD BALDWIN GUANO, for Bags FOLEY FAVORITE GUANO, for LIVE OAK GUANO bags 22.50# GUANO.

And to secure the payment of this note and any other sum I or we may owe the payee before this note is paid. I or we mortgage to said payee unim-
umbered property as follows:

My or our entire crops of Cotton, Corn, Potatoes and Farm Products, and all rents accruing to me or us for the year 191 4 and each succeeding year in the County in which I or we now reside or which I or we may hereafter reside in, until paid, and empower said payee or his endorsee to take possession of and sell the same whenever he deems himself insecure, by posting a notice of the place and terms of sale at the Foley Post Office, and I or we hereby waive all exemptions under the laws of the State of Alabama and the United States and agree to pay ten per cent. attorney fees, for collecting or securing same if not paid when due.

WITNESS:

M. B. Dewey

J. H. I

J. J. Middleton
A. J. Middleton

THE STATE OF ALABAMA,)
Baldwin County,)

I, L. H. H. SMITH, Judge of said County, do hereby certify that the

instrument was filed in this Office for recording on the 14th day of March 1914.

at _____ o'clock, and I further certify that the same is duly recorded in Record Book No. 13 n/40

Page 244 and duly examined.

Witness my hand this 18th day of March 1914

J. H. H. Smith
Judge of Probate Court
By *Mary Smith*

82.02
82.02
82.02
82.02
82.02

Princedor
not shown 1/18
Acct for
here

STATE OF ALABAMA, }
Baldwin County,)
I, L. H. H. Smith, Judge of Probate for said County, hereby certify that the following privilege tax has been paid on the within instrument as required by Acts 1902 & 1903 viz \$ 15 cts.
L. H. H. Smith
Judge of Probate
By *J. H. H. Smith*
Clerk

seen

\$ 95.50

Foley, Ala.,

3/24

1914

On or before Nov 1st 1914 I or we, promise to pay THE FOLEY FERTILIZER CO., or order Twenty five and 50/100 Dollars for value received, negotiable and payable at Foley, for Bags OLD BALDWIN GUANO, for Bags FOLEY FAVORITE GUANO, for LIVE OAK GUANO 90 bags GUANO.

And to secure the payment of this note and any other sum I or we may owe the payee before this note is paid. I or we mortgage to said payee unim-
cumbered property as follows:

- One Sound Mare age 8 yrs old - named Molly
- 2 Cows with calves - one red headed white & one Jersey
- Four cows, one red head & yellow & white, two black & one deep red & four calves

My or our entire crops of Cotton, Corn, Potatoes and Farm Products, and all rents accruing to me or us for the year 1914 and each succeeding year in the County in which I or we now reside or which I or we may hereafter reside in, until paid, and empower said payee or his endorsee to take possession of and sell the same whenever he deems himself insecure, by posting a notice of the place and terms of sale at the Foley Post Office, and I or we hereby waive all exemptions under the laws of the State of Alabama and the United States and agree to pay ten per cent. attorney fees, for collecting or securing same if not paid when due.

WITNESS:

M. D. Evey

957

A. J. Middleton
A. J. Middleton

Principal 25.50 13480
Int to Nov 21/98 30.56
Alloy for 12.160

(38.66)

I, Middleton Adminr
getting your money each
as follows on this note,
July 22/10, C.H.

THE STATE OF ALABAMA, } Office of the Judge of
BALDWIN COUNTY. } the Probate Court,

I, J. H. H. SMITH, Judge of said Court in and for
said County, do hereby certify that the within instru-
ment was filed in this office for record on the 6th
day of May, 1914, at

o'clock, and I further certify that the
same is duly recorded in Record Book No. 137mtg
Page 1180 and duly examined.

Witness my hand this 8th day of
May, 1914.

J. H. H. Smith Judge of Probate Court

By _____

STATE OF ALABAMA, }
Baldwin County. }

I, J. H. H. Smith, Judge of
Probate for said county, hereby certify that the following
privilege tax has been paid on the within instrument as re-
quired by Acts 1902 & 1903, to wit: \$ 15

J. H. H. Smith Judge of Probate
By J. H. H. Smith