

SUMMONS AND COMPLAINT

The State of Alabama

Baldwin County

No. ....

Circuit Court

Spring Term 1919 191

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon E. Edmundson

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 as Defendant.

by A. L. Weston

Plaintiff

Witness my hand this 14 day of April 191

Clerk.

COMPLAINT

A. L. Weston,

Plaintiff Versus

E. Edmundson,

The plaintiff claims of the defendant

Two hundred and eleven and 90/100 Dollars due by account on to wit; the 20th day of March 1914.

2. The plaintiff claims of the defendant the sum of Two hundred and eleven 90/100 Dollars for money loaned him on to wit; the 20th of March 1914.
3. The plaintiff claims of the defendant the sum of Two hundred and eleven 90/100 Dollars for money loaned by the plaintiff to the defendant on to wit; the 20th of March 1914.
4. The plaintiff claims of the defendant the sum of Two hundred and eleven 90/100 Dollars, on an account stated between the plaintiff and the defendant on, to wit; the 20th of March 1914
5. The plaintiff claims of the defendant the sum of Two hundred and eleven 90/100 Dollars for money received by the defendant for the use of the plaintiff on, to wit; the 20th of March 1914.

Which said sums of money with the interest thereon is still unpaid.

Mr. S. Anderson

Attorney for plaintiff.

Plaintiff's Attorney.

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No. ....

STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT

A. L. Weston

vs.

Plaintiffs

E. Edmundson

Defendants

SUMMONS AND COMPLAINT

Filed

April 14<sup>th</sup> 1919  
W. H. Richardson  
Clerk

Defendant lives at

Bay Minette, Ala.

Wm. S. Anderson,

Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette

Received in office

April 14 1919

O. B. Richardson  
Sheriff

I have executed this Writ

this

16 April 1919

by leaving a copy of the within summons and complaint  
with

E. Edmundson

O. B. Richardson  
Sheriff

Deputy Sheriff

A S Western  
vs  
J E Edmundson } Circuit Court  
Baldwin County  
Alabama.

Comes the defendant in the  
above styled case and for answer  
to plaintiffs complaint asks to  
each count thereof pleads the  
general issue.

Richard Trager & Bush  
attys for defendant

A. I. WESTON, PLAINTIFF

VS

E. EDMUNDSON, DEFENDANT.

)  
) IN THE CIRCUIT COURT OF BALDWIN  
)  
) COUNTY, ALABAMA.  
)

FIRST: Comes the defendant in the above styled cause and for answer to the Plaintiff's Complaint and to each count thereof, separately and severally, says, that the allegations thereof are untrue.

SECOND: Comes the defendant in the above styled cause and for further answer to the complaint of the plaintiff and to each count thereof, separately and severally, says, that the money claimed by the defendant was paid to defendant in his capacity as trustee for the heirs of John Valree, deceased; *for whom defendant was to collect the money and apply same to perfecting the title to the land.* that this representative capacity was known to and acquiesced in by the plaintiff at the time of such payment, and that the sum of money alleged to have been paid to the defendant was in the presence of the plaintiff paid over to the cestui que trustent and that defendant is not liable therefor.

*Richard F. Frazier & Burke*  
Attorneys for Defendant.

De Indants' Pleas

Filed Nov 11 1877  
D. W. Richardson  
Clerk

Richard F. Taylor  
City of New York

*[Faint handwritten notes and signatures]*