C. J. GAYFER AND COMPANY, ) IN THE CIRCUIT COURT OF a corporation, ) BALDWIN COUNTY, ALABAMA Plaintiff, ) AT LAW vs. ) 7/4/4 WILLIAM T. THORNTON, JR., individually and doing business ) as THORNTON & COMPANY, ) Defendants. )

### COUNT ONE

Plaintiff claims of the Defendant the sum of ONE THOUSAND
TWO HUNDRED EIGHTY-ONE AND 70/100 (\$1,281.70) DOLLARS as damages,
for the breach of a written contract entered into by him on the 24th
day of August, 1965, by which the Defendant promised to pay to the
Plaintiff the said sum on the 24th day of November, 1965, and that
the Defendant has defaulted and failed to pay as set out in the
written agreement.

That in and by the terms of said agreement, the Defendant agreed to pay all costs of collection, including a reasonable attorneys fee, and the Plaintiff now claims the further and additional sum of TWO HUNDRED FORTY (\$240.00) DOLLARS as a reasonable attorneys fee.

That in and by the terms of the said agreement, the Defendant waived all rights of exemption under the Constitution and Laws of Alabama, and the Plaintiff now claims the benefit of said waiver.

## COUNT TWO

Plaintiff claims of the Defendant the sum of ONE THOUSAND TWO HUNDRED EIGHTY-ONE AND 70/100 (\$1,281.70) DOLLARS for goods, merchandise and chattels sold by the Plaintiff to the Defendant on, to-wit: the 24th day of August, 1965, which sum of money, with the interest thereon is still unpaid.

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ADD SANSTER

ATTORNEY FOR PLAINTIFF

C. J. GAYFER AND COMPANY.

a corporation,

Plaintiff,

VS.

WILLIAM T. THORNTON, JR., individually and doing business as THORNTON & COMPANY,

Defendants.

) IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW

7/4/4

Defendants.

### COUNT ONE

Plaintiff claims of the Defendant the sum of ONE THOUSAND TWO HUNDRED EIGHTY-ONE AND 70/100 (\$1,281.70) DOLLARS as damages, for the breach of a written contract entered into by him on the 24th day of August, 1965, by which the Defendant promised to pay to the Plaintiff the said sum on the 24th day of November, 1965, and that the Defendant has defaulted and failed to pay as set out in the written agreement.

That in and by the terms of said agreement, the Defendant agreed to pay all costs of collection, including a reasonable attorneys fee, and the Plaintiff now claims the further and additional sum of TWO HUNDRED FORTY (\$240.00) DOLLARS as a reasonable attorneys fee.

That in and by the terms of the said agreement, the Defendant waived all rights of exemption under the Constitution and Laws of Alabama, and the Plaintiff now claims the benefit of said waiver.

#### COUNT TWO

Plaintiff claims of the Defendant the sum of ONE THOUSAND TWO HUNDRED EIGHTY-ONE AND 70/100 (\$1,281.70) DOLLARS for goods, merchandise and chattels sold by the Plaintiff to the Defendant on, to-wit: the 24th day of August, 1965, which sum of money, with the interest thereon is still unpaid.

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CHAN CAGTER ATTORNEY FOR PLAINTIFE

# STATE OF ALABAMA

Circuit Court, Baldwin County

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STA	ATE OF Baldwin		AMA	· 
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JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Spanish Fort, Alabama
Received In Office
AUG 2 5 1966
TAYLOR WILKINS
Sheriff
I have executed this summons
this CMA 27 19 Ly
by leaving a copy with
Villiam Abornton ()
Offering Gent
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Sheriff claims 44 miles at
Ten Cents per mile Total \$
TAYLOR WILKINS, STRAIT
SEPUTY SHERIFT
Jany My John Sheriff
Ros Rowell Deputy Sheriff

Defendant lives at