

SPEED LETTER

JOHN V. DUCK
~~DUCK & LACEY~~

Attorneys at Law
 P. O. DRAWER A-J - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck
 Bay Minette, Alabama

DATE

DATE February 20, 1967

Re: Douglas Kier vs. Morgan Sirmons

Dear Mrs. Duck:

710.7348

Enclosed please find Bill of Complaint to be
 filed together with copy of same and Summons to
 be served.

Sincerely,

John V. Duck

SIGNED

SIGNED

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonMORGAN SIMMONS

.....
.....
.....

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.....

.....MORGAN SIMMONS....., Defendant.....

byDOUGLAS KIER.....

....., Plaintiff.....

Witness my hand this.....22.....day of.....Feb.....1947.....

.....
.....
.....Clerk

No.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

DOUGLAS KIER

Plaintiffs

vs.

MORGAN SIMONS

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Evergreen, Alabama

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

DOUGLAS KIER,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW
MORGAN SIMMONS,	)	
Defendant.	)	

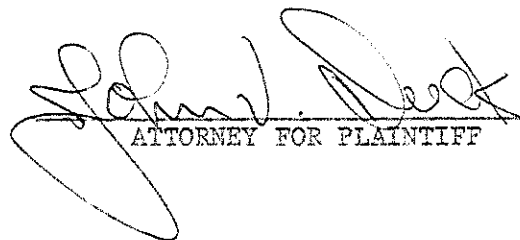
COUNT ONE

Plaintiff claims of the Defendant the sum of FOUR HUNDRED FORTY-EIGHT AND 74/100 (\$448.74) DOLLARS due by promissory note made by him on the 16th day of July, 1966 and payable in eighteen installments of TWENTY-FOUR AND 93/100 (\$24.93) DOLLARS per month.

That in and by the terms of said note, the Defendant agreed that in the event of a default in any one payment, the entire balance would become due and payable, and the Plaintiff avers that the Defendant has defaulted in the payments of the said note.

That in and by the terms of said note, the Defendant agreed to pay all costs of collection, including a reasonable attorney's fee, and the Plaintiff now claims the further and additional sum of SEVENTY-FIVE (\$75.00) DOLLARS as a reasonable attorney's fee.

Plaintiff further alleges that in and by the terms of said note, the Defendant waived all rights of exemption under the Constitution and laws of Alabama, as to personal property, and the Plaintiff now claims the benefit of said Waiver.


 ATTORNEY FOR PLAINTIFF

FILED

FEB 22 1967

ALB: J. V. RUCK
CLERK

DOUGLAS KIER,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW
MORGAN SIRMONS,	)	<i>Mc 7288</i>
Defendant.	)	

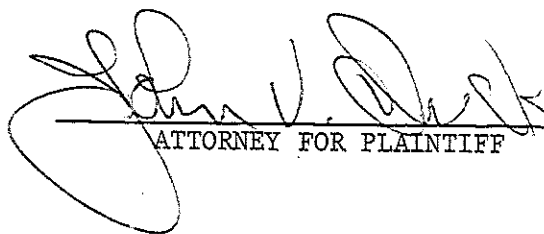
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That in and by the terms of said note, the Defendant agreed to pay all costs of collection, including a reasonable attorney's fee, and the Plaintiff now claims the further and additional sum of SEVENTY-FIVE (\$75.00) DOLLARS as a reasonable attorney's fee.

Plaintiff further alleges that in and by the terms of said note, the Defendant waived all rights of exemption under the Constitution and laws of Alabama, as to personal property, and the Plaintiff now claims the benefit of said Waiver.


ATTORNEY FOR PLAINTIFF

FILED

FEB 22 1967

ALBANY, ALA. CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon MORGAN SIRMONS

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.....

.....MORGAN SIRMONS....., Defendant.....

byDOUGLAS KIER.....

....., Plaintiff.....

Witness my hand this 22 day of Feb 1967

Cliff J. Welch Clerk

77 F,

No. 7388

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

DOUGLAS KIER

Plaintiffs

vs.

MORGAN SIRMONS

Defendants

SUMMONS AND COMPLAINT

Filed 2-22 1967

John V. Duck Clerk

Not Found in this County
This the 7th day of March
1967.

JAMES M. BROCK, SHERIFF

BY *John V. Duck* D.S.

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Evergreen, Alabama

Received In Office

FEB 22 1967

19.....

TAYLOR WILKINS

SHERIFF

, Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff