JOHN P. BEEBE ATTORNEY AT LAW ROBERTSDALE, ALABAMA

May 9th, 1967

Mrs. Alice J. Duck, Clerk, Circuit Court, Baldwin County, Bay Minette, Alabama.

Dear Mrs. Duck:

I enclose original and two copies of summon and complaint involving Alfred Mosley, as plaintiff, and against Lloyd G. Langham and Tommy M. Langham, as defendants, with the request that suit be filed in the Circuit Court and the Sheriff requested to summons the defendants.

Lloyd G. Langham operates a grocery store south of Bay Minette on Highway 31 and Tommy M. Langham is employed at International Paper Company on Highway 31 South of Bay Minette.

Thanking you, I am

Yours very truly,

STATE OF ALABAMA)								
)	\mathtt{TO}	ANY	SHERIFF	OF	THE	STATE	OF	ALABAMA:
BALDWIN COUNTY)								

You are hereby commanded to summons LLOYD G. LANGHAM and TOMMY M. LANGHAM, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County, at the place of holding the same, then and there to answer the complaint of ALFRED MOSLEY.

Witness my hand, this the day of May, 1967.

Olice Olerk

ALFRED MOSLEY,	· · · · · · · · · · · · · · · · · · ·	IN THE CIRCUIT COURT OF
Plaintiff, vs)))	BALDWIN COUNTY, ALABAMA.
LLOYD G. LANGHAM, and TOMMY M. LANGHAM,)	AT LAW
Defendants.	}	No. 7514

COUNT ONE

The Plaintiff claims of the Defendants the sum of ONE THOUSAND EIGHT HUNDRED FIVE & 31/100 (\$1805.31) DOLLARS, due by promissory note made by them on the 9th day of September, 1964, and payable on demand, with interest thereon, is due and unpaid.

The Defendants by said note waive as to this debt all right of exemption under the constitution and laws of the State of Alabama, and the Plaintiff claims the benefit of said waiver.

Plaintiff further avers that as a part of the consideration for said note, and which said note provides, that the Defendants would pay all costs of collecting said note, including a reasonable attorney's fee, and the Plaintiff claims of the Defendants the further and additional sum of THREE HUNDRED FIFTY (\$350.00) DOLLARS, as a reasonable attorney's fee in the premises.

COUNT TWO

The Plaintiff claims of the Defendants the further and additional sum of ONE THOUSAND THREE HUNDRED THIRTY ONE & 05/100 (\$1331.05) DOLLARS, due by promissory note made by them on the 9th day of September, 1964, and payable on demand, with interest thereon,

is due and unpaid.

The Defendants by said note waive as to this debt all right of exemption under the constitution and laws of the State of Alabama, and the Plaintiff claims the benefit of said waiver.

Plaintiff further avers that as a part of the consideration for said note, and which said note provides, that the Defendants would pay all costs of collecting said note, including a reasonable attorney's fee, and the Plaintiff claims of the Defendants the further and additional sum of TWO HUNDRED FIFTY (\$250.00) DOLLARS, as a reasonable attorney's fee in the premises.

Attorney for Plaintiff

John P. Beebe, Attorney at Law, Robertsdale, Alabama.

FULED

MAY 10 3967

ALKE I DAKE EEGISTER

(= 19-67

730

id on / day of May 1967 Alfred Mosley,

and a copy of the within of C

Alarghan

Alarghan

Alarghan

Plaintiff

12.

Byll I To live to. & Lloyd & Langhamt
Jommy M. Langham Defendants,

MAY 10 (88)

John P. Deebe

O IN THE CIRCUIT COURT ALFRED MOSLEY, Plaintiff BALDWIN COUNTY, ALABAMA vs. , AT LAW
NUMBER: LLOYD S. LANGHAM, and TOMMY M. LANGHAM, Defendants . - . - . - . - . - . ANSWER Comes now Defendant, Lloyd G. Langham and for answer to the Complaint says: The allegations contained therein are untrue. Defendant demands trial by jury this 12th day of June, 1967.

do hereo, reday --19(1) served a top20 parties to this properly addressed, with the class pools a popular.

Whole was a served a top10 parties to this properly addressed. With the class pools a popular.

Filed 6-12-69 Alice J. Duch Olern