

COLLINS, GALLOWAY & MURPHY
ATTORNEYS AT LAW
958 DAUPHIN STREET
MOBILE, ALABAMA 36604

FRED G. COLLINS
THOMAS M. GALLOWAY
M. THOMAS MURPHY (1924-1956)
JAMES H. LACKEY

October 13, 1967

P. O. BOX 4492
TELEPHONE
432-0568
AREA CODE 205

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

Re: E. R. Hall
Vs: J. L. Harris, Jr.


Dear Mrs. Duck:

I enclose herewith a complaint with copy which I would appreciate your filing the original in the Court and having the copy served upon the Defendant.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

By:


Thomas M. Galloway

TMG/fs
Encls:

E. R. HALL, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
VS: :
J. L. HARRIS, JR., : AT LAW
Defendant. : CASE NO. 7785

COUNT ONE

The Plaintiff claims of the Defendant ONE THOUSAND SEVEN HUNDRED THIRTY FIVE AND 00/100 (\$1,735.00) DOLLARS, due by promissory note made by him on the 11th day of April 1966 and payable on demand, and Plaintiff alleges that although he has demanded payment thereof the Defendant has failed and refused to pay same together with interest thereon.

Plaintiff further claims of the Defendant FIVE HUNDRED SEVENTY FIVE AND 00/100 (\$575.00) DOLLARS, as an Attorney's fee, said promissory note providing that in the event an Attorney was needed for collection of said sum that the Defendant would pay a reasonable Attorney's fee and Plaintiff alleges that such sum is reasonable.

Plaintiff further avers that by the terms of said note Plaintiff did waive all of his exemptions under the Constitution and Laws of the State of Alabama.

COLLINS, GALLOWAY & MURPHY

By: Thomas M. Galloway

THOMAS M. GALLOWAY
ATTORNEYS FOR PLAINTIFF

Address of Defendant:

Marcella Drive in Wilson Place
at Spanish Fort, Alabama.

FILED

OCT 16 1967

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7785

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon J. L. HARRIS, JR.

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

J. L. HARRIS, JR.

Defendant

by

E. R. HALL

Plaintiff

Witness my hand this 16th day of October 1967

EL 10-19-67

Alice D. Duck Clerk

No. 7785

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

E. R. HALL

Plaintiffs

vs.

J. L. HARRIS, JR.

Defendants

SUMMONS AND COMPLAINT

Filed October 16, 1967

Alice J. Duck

Clerk

Collins, Galloway & Murphy

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

OCT 16 1967

19.....

TAYLOR WILKINS

SHERIFF

Sheriff

I have executed this summons

this Oct 19 1967

by leaving a copy with

J. L. Harris Jr.
Sp. Int.

44
440
Roy Randall
Deputy Sheriff

Taylor Wilkins Sheriff
Roy Randall Deputy Sheriff