

P. O. DRAWER A-J

RICHARD C. LACEY

TELEPHONE 928-2373

ATTORNEY AT LAW
FAIRHOPE, ALABAMA 36532

December 20, 1967

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

Re: Parker vs. Maxwells

Dear Mrs. Duck:

Please have the enclosed Bill of Complaint served.

Thank you.

Sincerely,

Richard C. Lacey
Richard C. Lacey (mt)

RCL:mt

Encls.

7926

MRS. MORGAN M. PARKER,) IN THE CIRCUIT COURT OF
 Plaintiff,) BALDWIN COUNTY, ALABAMA
 VS.) AT LAW
 THOMAS C. MAXWELL and) CASE NO. 2926
 BRENDA V. MAXWELL, jointly)
 Defendant.)

BILL OF COMPLAINT

1. The Plaintiff claims of the Defendants the sum of SEVENTY-FIVE DOLLARS (\$75.00), damages, for breach of lease entered into by and between Plaintiff and Defendants on the 23rd day of May, 1967, in and by the terms of which Defendant was to pay to the Plaintiff SEVENTY-FIVE DOLLARS (\$75.00) each month as rent and the Defendant, without knowledge or authority from the Plaintiff moved from the premises, owing rental for one (1) month period prior to the expiration of said lease.

2. Plaintiff claims of the Defendant the sum of SEVENTY-FIVE DOLLARS (\$75.00), damages, for the breach of a lease entered into by and between the Plaintiff and the Defendant on the 23rd day of May, 1967, by the terms of which the Defendant agreed to return the premises to the Plaintiff in the condition in which it was originally rented, fair wear and tear excepted; Plaintiff avers and alleges that Defendant damaged the interior of the premises leased to the Defendant making it necessary to repaint certain portions of the interior of the premises and further that the Defendant broke certain plumbing fixtures, all to the damage of the Plaintiff as aforesaid.

3. The Plaintiff claims of the Defendant the sum of SEVENTY-FIVE DOLLARS (\$75.00), damages, for the breach of a lease entered into by and between the Plaintiff and the Defendant on the 23rd day of May, 1967, in which the Defendant agreed to pay any and all attorney's fees for the enforcement or collection of the lease, all to the damage of the Plaintiff as aforesaid.

Robert L. Lacey
 Attorney for Plaintiff

Defendants reside at:
 456 Dogwood
 Fairhope, Alabama

FILED

DEC 21 1967

ALICE J. DUCK

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7926

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Thomas C. Maxwell and Brenda V. Maxwell, jointly.

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 Thomas C. Maxwell and Brenda V. Maxwell, jointly, Defendant.

by Mrs. Morgan M. Parker, Plaintiff.

Witness my hand this 21 day of Dec 1967 Alice J. Luck Clerk

34-1-6-68

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

~~THOMAS C. MAXWELL~~

Mrs. Morgan M. Parker

Plaintiffs

vs.

Thomas C. Maxwell and Brenda
V. Maxwell, jointly Defendants

SUMMONS AND COMPLAINT

Filed **FILED** 19.....

DEC 21 1967

Clerk

ALICE J. DUCK

CLERK
REGISTER

Richard C. Lacey - Fairhope,
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

456 Dogwood
Fairhope, Alabama

Received, **RECEIVED**

DEC 21 1967

19.....

TAYLOR WILKINS

Sheriff

Sheriff

I have executed this summons

this Jan 6 1968
by leaving a copy with

Thomas C. Maxwell
Brenda V. Maxwell
Li'l'ly

Sheriff claims 140 miles of

Ten Cents per mile Total \$ 14.00

TAYLOR WILKINS, Sheriff
by Roy Randall
DEPUTY SHERIFF

Gaylor Wilkins Sheriff
Roy Randall Deputy Sheriff