

STATE OF ALABAMA
COUNTY OF BALDWIN

)
)
)
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SUMMON JOHN S. KEEL, TO APPEAR
AND ANSWER, PLEAD OR DEMUR, WITHIN THIRTY DAYS FROM THE DATE HEREOF
OF THIS SERVICE, TO A BILL OF COMPLAINT FILED AGAINST HIM IN THE
CIRCUIT COURT, AT LAW, FOR SAID COUNTY AND SAID STATE BY JOHN
MARSHALL, PLAINTIFF.

HEREIN FAIL NOT, DUE RETURN MAKE OF THIS WRIT AS THE LAW DIRECTS

WITNESS MY HAND THIS THE 15th DAY OF FEBRUARY, 1968.

Alice J. Duck
REGISTER
Clerk

JOHN MARSHALL,
PLAINTIFF

VS

JOHN S. KEEL,
DEFENDANT

)
)
)
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO: 7996

COUNT ONE:

PLAINTIFF CLAIMS OF DEFENDANT THE SUM OF FIVE HUNDRED DOLLARS
(\$500.00), DUE BY PROMISSORY NOTE MADE BY HIM ON, HERETOFORE, TO-WIT
OCTOBER 5, 1967, WHICH SUM OF MONEY, WITH INTEREST THEREON, IS DUE
AND UNPAID; AND PLAINTIFF AVERS THAT IN AND BY THE TERMS OF SAID
NOTE, THE DEFENDANT WAIVED ALL RIGHTS OF EXEMPTION UNDER THE LAWS
OF THE STATE OF ALABAMA, AND PLAINTIFF CLAIMS THE BENEFIT OF SAID
WAIVER; PLAINTIFF CLAIMS THE ADDITIONAL SUM OF \$100.00 AS A REASON-
ABLE SUM AS ATTORNEY FEES FOR BRINGING THIS SUIT FOR THAT THE DE-
FENDANT IN AND BY THE TERMS OF SAID NOTE AGREED TO PAY A REASONABLE
ATTORNEY FEE, AND PLAINTIFF AVERS THAT SAID AMOUNT IS A REASONABLE
ATTORNEY FEE FOR THE BRINGING AND PROSECUTING OF THIS SUIT.

FILED

FEB 15 1968

ALICE J. DUCK
CLERK
REGISTER

Ernest M. Bailey
ERNEST M. BAILEY
ATTORNEY FOR PLAINTIFF

STATE OF ALABAMA)
COUNTY OF BALDWIN)

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Alice D. Duck
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ALICE D. DUCK
CLERK
REGISTER

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delivered 15 day of Jul 1968
I on day of 19
received a copy of the within John D. Keel
service on
TAYLOR WILKINS, Sheriff
By D. S.

Not found moved
away Randall

Returned 27 day of Mar 1968
Not found In my county after diligent search and in-
quiry. as to John D. Keel
Taylor Wilkins, Sheriff
By Randall
Deputy Sheriff

John Marshall
Plt.

vs.
John S. Keel
Deft.

FILED
FEB 15 1968

ALICE J. BUCK
CLERK
REGISTER

Ernest M. Bailey
Atty.

[Faint, mostly illegible text from the reverse side of the document, appearing as bleed-through.]