

MABIN MANFORD WILLIAMSON

PLAINTIFF

VS.

E. P. BELL

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER

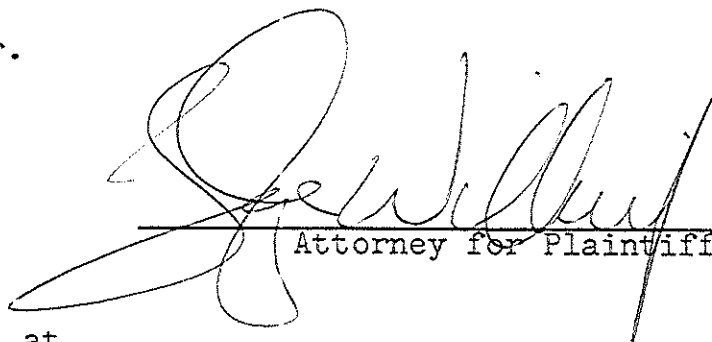
8315

* * * * *

I.

The Plaintiff claims of the Defendant TWENTY-FIVE HUNDRED DOLLARS (\$2,500.00) damages for a breach of warranty in the sale of the North 50 feet of Lot 1, and the South 50 feet of Lot 2, in Block 12, of Hand Land Company's Addition to Town of Bay Minette, Alabama, by him to the Plaintiff, on the 16th day of July, 1968, which the defendant warranted to the plaintiff that he was lawfully seized in fee simple of said premises and that they were free from all encumbrances, when in fact there was an encumbrance on this property in the form of a mortgage given by David D. Jaye to the Baldwin County Bank in the amount of EIGHT HUNDRED FIFTY DOLLARS (\$850.00) with interest thereon, dated July 30, 1949, and recorded in the Office of the Probate Judge in Mortgage Book 158, Page 101, which sum of money is now due and payable.

Plaintiff further claims of the Defendant a reasonable Attorney's fee for representation of the Plaintiff's interest in the aforestyled matter.


Attorney for Plaintiff

Defendant may be found at

West First Street
Bay Minette, Alabama

FILED

SEP 12 1968

ALICE J. DUCK 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 SummonE. P. Bell.....

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.....

.....E. P. Bell..... Defendant.....

byMabin Manford Williamson.....

..... Plaintiff.....

Witness my hand this.....12.....day of.....Sept.....1968.....

Oliver J. [Signature]
Clerk

Ex-9-24-68

No. 8315

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Mabin Manford Williamson

Plaintiffs

vs.

E. P. Bell

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

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Clerk

ALICE J. DUCK

CLERK
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

West First Street
Bay Minette, Alabama

Received In Office

SEP 11 1968

19.....

WILKINS

Sheriff

I have executed this summons

this Sept 24 1968

by leaving a copy with

E P Bell

Taylor Williams Sheriff

W A Bell Deputy Sheriff