

1582

STATE OF ALABAMA)
BALDWIN COUNTY) IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Steve W. Payne 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 Wilmer F. Pope, individually and doing business as Fairhope Grocery & Market.

Witness my hand this 14th day of ~~October~~^{November}, 1950.

Deirda Leuch
Clerk.

COMPLAINT

WILMER F. POPE, individually	¶	IN THE CIRCUIT COURT OF
and doing business as	¶	BALDWIN COUNTY, ALABAMA
FAIRHOPE GROCERY & MARKET,	¶	LAW SIDE.
Plaintiff,	¶	
vs.	¶	
STEVE W. PAYNE,	¶	
Defendant.	¶	

COUNT ONE:

The Plaintiff claims of the Defendant Two Hundred Eighty-nine and 57/100 Dollars (\$289.57) due by Promissory Note made by him on the 23rd day of May, 1950, and payable on the first day of October, 1950, with interest thereon.

The Plaintiff avers that in, by and as a part of said note the Defendant agreed to pay all costs of collecting, or securing, or attempting to collect or secure said note, including a reasonable attorneys fee whether the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant the further and additional sum of Sixty Dollars (\$60.00) as such reasonable attorney's fee.

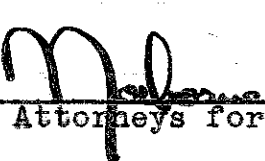
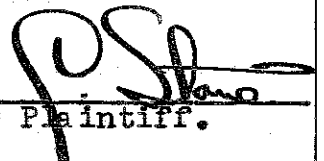
The Plaintiff further avers that in, by and as a part of said note the Defendant waived as to this debt or any renewal thereof, all rights to exemption under the constitution and laws of Alabama as to personal property and of this waiver the Plaintiff now claims the benefit.

COUNT TWO:

The Plaintiff further claims of the Defendant Two Hundred Eighty-nine and 57/100 Dollars (\$289.57) for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 23rd day of May, 1950, which sum of money, with the interest thereon, is still unpaid.

CHASON & STONE

By:

 
Attorneys for Plaintiff.

FILED 11-24-50
BY CLERK OF COURT, BALDWIN COUNTY, ALABAMA

1582

SUMMONS AND COMPLAINT

WILMER F. POPE, individually,
and doing business as FAIRHOPE
GROCERY & MARKET,

Plaintiff,

vs.

STEVE W. PAYNE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

Executed 12-13-50 19

by *Ernest* *by* *Ernest* *by* *Ernest*

Ernest *by* *Ernest* *by* *Ernest*

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LAW OFFICES
HYBART, CHASON & STONE

BAY MINETTE, ALABAMA

4 filed 11-24-50
Ernest *by* *Ernest* *by* *Ernest*