

O. L. MURPHY

PLAINTIFF

VS

LONNIE HADLEY

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

Now comes the Defendant and for answer to the Plaintiff's complaint and to each count thereof separately and severally says:

1.

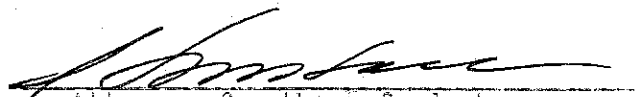
The facts therein alleged are untrue.

2.

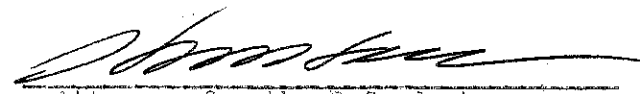
That he is not indebted to the Plaintiff in the manner and form alleged.

3.

That the account and note sued on were paid in full before the commencement of this suit.


Attorney for the Defendant

The Defendant demands a trial by jury.


Attorney for the Defendant

STATE OF ALABAMA
Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LONNIE MADLEY 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 O. L. MURPHY.

WITNESS my hand, this 22nd day of December, 1950.

Archie J. Duck
Circuit Court

O. L. MURPHY

PLAINTIFF

VS

LONNIE MADLEY

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

STATE ONE:

Plaintiff claims of the defendant the sum of One Hundred Twenty-Five (\$125.00) Dollars, the rent of a tract of land, viz: Thirty acres of farming land and residence located at the forks of the road east of the present home of David Dean and property of the plaintiff, devised by the plaintiff to the defendant on the 10th day of March, 1950, for the crop year of 1950.

COUNT TWO:

The plaintiff claims of the defendant One Hundred Twenty-Five (\$125.00) Dollars, due by promissory waive note made by him on the 10th day of March, and payable on the 15th day of September, with interest thereon.

Chas. E. Thompson
Attorney for plaintiff

Excluded Jan 2, 1951
By returning copy of
the Willin-Sumner
complaint on
Bernie Hooley
Taylor William Skiff
147 Wall St. 5-

701595

RECORDED

U. S. DEPT. OF JUSTICE

RECEIVED

RECEIVED

RECEIVED

RECEIVED

FILED

DEC 22 1950

ALICE L. BRY, Clerk

From the Law Offices of
C. Leopold Thompson
Key Bldg., Toledo, Ohio