

CLARA J. HALL, MATTIE LOUISE
HALL and CORNELIA HALL,

Plaintiffs,

-vs-

FRANK F. EARLE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

Comes the Defendant and demurs to the Complaint in this
cause filed, and to each and every count thereof, separately and
severally, and as grounds therefor says:-

FIRST:

That said Complaint does not state a cause of action.

Hyatt Head & Mason
Attorneys for Defendant.

STATE OF ALABAMA

CIRCUIT COURT --LAW SIDE

BALDWIN COUNTY

To any Sheriff of the State of Alabama:

You are hereby commanded to summon FRANK F. EARLE
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 CLARA J. HALL, MATTIE LOUISE HALL and CORNELIA HALL, .

Witness my hand , this 18th day of February, 1934.

M. A. Stone
Clerk.

CLARA J. HALL, MATTIE LOUISE
HALL and CORNELIA HALL,

Plaintiffs

vs.

FRANK F. EARLE,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

ONE

The plaintiffs claim of the defendant Twenty-five Hundred (\$2500.00) Dollars, balance due on promissory note made by the defendant on the 25th day of August, 1923, for the sum of Five Thousand Five Hundred (\$5,500.00) Dollars and payable on the first day of July, 1924, with interest thereon; and the plaintiffs allege that the defendant made payments on said note from time to time, the last of said payments being made by the defendant within less than six years prior to the date of this suit, said note being payable to Charles Hall; and plaintiffs further aver that the said note waives all right of exemption allowed the defendant under the laws of Alabama, and further provides for the payment of a reasonable attorney's fee for the collection thereof, which said fee the plaintiffs allege to be Two Hundred and Fifty (\$250.00) Dollars, and which they herewith claim, and plaintiffs further aver that they are the owners of the above said note and that same is in their possession.

Gordon Edington Tugh
ATTORNEYS FOR PLAINTIFFS

Plaintiffs demand a trial by jury of the above said
cause.

Gordon Edington Tugh
ATTORNEYS FOR PLAINTIFFS

Clara Hall & } In the event
Frank Earl } of
Baldwin Co
at Law

Now connects the
defendants of record
the course to trace for
the above case to the
signify - cannot be consolidated
the same with case of
Frank Earl vs the above
parties - said was being
the basis of the majority of
in debtors

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after for Dyde-

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Clara Hall
ET al

RECORDED

22

Frank E. Hall

Filed Aug. 22nd 1934
W. A. Stone
Clerk,

ORIGINAL COPY

RECORDED

CIVIL CASE NO. 23

Executed February 13th 1934
by serving copy of within Summons and
Complaint on

Frank F. Earle

RECORDED

CLARA HALL, MATTIE LOUISE
HALL AND CORNELIA HALL

VS

FRANK F. EARLE

SUMMONS & COMPLAINT

FILED ON REVERSE SIDE

Filed Feb. 10th 1934
W. A. Stone
Clerk.

(2)

23 RECORDED
DEMURRER.

CLARA J. HALL, MATTIE LOUISE
HALL and CORNELIA HALL,

Plaintiffs,

-VS-

FRANK F. EARLE,

Defendant.

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

Filed March 12th, 1934

G. A. Stone
Clerk.

copy to B. C. & Leigh
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