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GEORGANNA T. IVES,
Plaintiff,

vs.

CHARLES A. KINNEY,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned, a Notary Public in and for said County, in said State, this day personally appeared GEORGANNA T. IVES, who being by me duly sworn, deposes and says that she is the plaintiff in the above styled cause; that on February 1st, 1938, she obtained judgment in the Circuit Court of Baldwin County, Alabama, for the sum of \$900.00 against Charles A. Kinney; that the said Charles A. Kinney is about to remove his property from the State of Alabama and she will probably lose her debt.

This affidavit is made for the purpose of procuring the issuance of execution on the said judgment forthwith.

Georganna T. Ives

Sworn to and subscribed before
me on this the 27 day of
February, 1938.

Geo W. Morgan
Notary Public, Baldwin County,
Alabama.

STATE OF ALABAMA.

BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon CHARLES A. KINNEY 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 GEORGANNA T. IVES.

Witness my hand, this the 16 day of October, 1937.

Reuben
Clerk.

GEORGANNA T. IVES,
Plaintiff,

vs.

CHARLES A. KINNEY,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

Plaintiff claims of the defendant the sum of FIVE HUNDRED DOLLARS (\$500.00) due from him by promissory note made by him on the 15th day of August, 1926, and payable on the 15th day of August, 1927, with interest thereon at the rate of six per cent. (6%) per annum.

Plaintiff further alleges that in and by the said note the defendant waived all right of exemption to personal property under the laws of the State of Alabama, and plaintiff claims the benefit of said waiver.

Plaintiff further alleges that in and by said note the said defendant agreed to pay all cost of collecting the same, including a reasonable attorneys' fee, and the plaintiff claims ONE HUNDRED FIFTY DOLLARS (\$150.00) as a reasonable attorneys' fee in the premises.

Bebe Hall Bebe
Attorneys for Plaintiff.

Package
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394

GEORGINA T. ITES,
Plaintiff,

vs.

CHARLES A. KINNEY,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AP 1417.

SUMMONS AND COMPLAINT.

Filed October 16, 1937.

DeRosa
Clerk.

BEEBE, HALL & BEEBE
LAWYERS
BAY MINETTE, ALA.

Received this _____ day of _____
By serving the within
named Defendant

and placing him _____

Presented *18-16-* _____ 1937
by serving copy of within Summons and
Complaint on

Charles A. Kinney

M. H. McIlwain Sheriff
by *C. H. Anderson* Deputy Sheriff