

JESSE FRENCH, III, individually and  
doing business as JESSE FRENCH  
COMPANY,

Plaintiff,

v.


AMY T. PARKER,

Defendant.

:  
: IN THE CIRCUIT COURT OF  
:  
: BALDWIN COUNTY, ALABAMA.  
:  
: AT LAW NO. 405.

Plaintiff claims of the defendant the sum of \$207.12, due by a promissory note made by one Marvel Seavey on, to-wit, August 31, 1936, payable in installments of \$17.26 each, for a period of 24 months, the first of said payments being due and payable one month after the date of said note. The plaintiff avers that on, to-wit, August 2, 1937, the defendant, in writing, assumed and agreed to pay the installments then remaining unpaid under the terms of said note. Plaintiff further avers that under and by virtue of the terms of said note, it was provided that should the maker of said note default in any installment, the remaining unpaid installments should thereupon become due and payable. Plaintiff avers that the maker of said note and the defendant herein have defaulted in the payment of the installments due under said note and that the entire balance remaining unpaid, to-wit, \$207.12, with interest from, to-wit, November 1st, 1937, is due and unpaid.

Plaintiff further avers that in said promissory note, and by the written agreement wherein the defendant assumed the obligation thereof, it was provided that the defendant waived all rights of exemption as to personal property under the Constitution and laws of the State of Alabama; and further, that in the event said note should be placed in the hands of an attorney for collection, the defendant agreed to pay a reasonable attorney's fee for the collection of the indebtedness due on said note. And the plaintiff avers that the sum of \$35.00 is a reasonable attorney's fee, which said sum the plaintiff claims also of the defendant.

  
Attorney for Plaintiff.

*[Faint signature at top of page]*

RECORDED  
8-10-1

June Direct  
Co

JS

May J Parker

Dec 3, 1937  
Direct  
Co

Executed this 3<sup>rd</sup> day of  
Dec- 1937 By leaving  
a copy of the within  
summons with  
Amy J. Parker.  
The defendant  
Ms Hadickin Sheriff  
By John R. Davis  
D.S.

THE STATE OF ALABAMA, }  
Baldwin County.

No. \_\_\_\_\_ CIRCUIT COURT

December. 22. 1937

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon AMY T PARKER.

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in  
the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against

Amy T Parker. Defendant by Jesse French III Individually  
and Doing Business. as Jesse French Company.

Plaintiff

Witness my hand this 22 day of December, 1937

*R. French*  
Clerk.

## COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

Francis T Inge.

Plaintiff's Attorney.



No. 405..... Page.....

**THE STATE OF ALABAMA,**  
BALDWIN COUNTY

**CIRCUIT COURT**

JESSE FRENCH, III  
Plaintiff...  
I2 S. Joachim St. Mobile Ala.  
vs.

AMY T. PARKER

Defendant ...

**Civil Execution for Costs  
Against Plaintiff**

Costs - - - - - \$ 12.00

Civil Fee Book... CDS... Page

Execution Docket... Page

Filed... December 15th., 1941.

*R. Stuart* Clerk.

*Francis J. Jones* Plaintiff's Attorney  
*First National Bank*

Defendant's Attorney

Received in Sheriff's Office

this 15 day of Dec., 1941

W. R. STUART, Sheriff

COLLECTION COSTS FROM

**The State of Alabama,**  
BALDWIN COUNTY

I hereby certify that the within  
and costs in this case are correct, and there  
was ..... waiver of exemption as to personal  
property under the Constitution and Laws of  
Alabama.

This ..... day of ..... 194 .....

Clerk.

Received in office .....

194 .....

Sheriff

Sheriff's Execution Docket, Page .....

Sheriff's Fee Book, ..... Page

*Returned March 10, 1942*

*for a lien*

*W. R. Stuart, Sheriff*  
*By W. B. Hamilton Deputy Sheriff*

**THE STATE OF ALABAMA,**  
**Baldwin County.**

By virtue of the within execution, I have at .....

o'clock, ..... M., this ..... day of ..... 194 ..... levied

Sheriff

DETACH BEFORE DEPOSITING

\* \*

FRED HIGGINS, MOBILE, ALABAMA

~~COSTS~~ CASE FILED BY BEEBE, HALL & BEEBE

IN RE ALF JOHNSON VS. STAR FRUIT & PRODUCE CO AND/OR J M FARNELL

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