

367

FARMERS & MERCHANTS BANK,
a Corporation,

Plaintiff,

VS.

TAYLOR GLASS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

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

1. That he pleads in short, by consent, the general issue with the right to introduce in evidence such facts or matters as would be admissible if well pleaded.

Buck, Hall & Buck
Attorneys for Defendant.

367 Duck
RECORDED 8-11

ANSWER:

FARMERS & MERCHANTS BANK,
a Corporation,

Plaintiff,

VS.

TAYLOR GLASS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

Filed August 4, 1937
Robert S. Duck, Clerk.

FARMERS' & MERCHANTS' BANK)
OF FOLEY, a Corporation,)
Plaintiff,)

vs.)

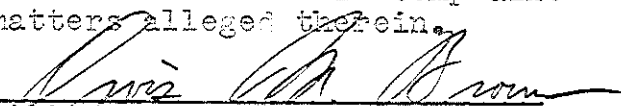
MRS. M. BREWTON and)
M. L. BREWTON,)
Defendants.)

ANSWER.

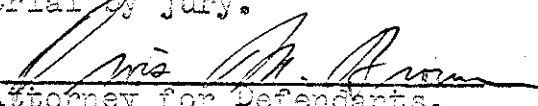
SEPARATE ANSWER OF MRS. M. BREWTON, one of the Defendants in the Bill of Complaint in this Cause.

Said Defendant, answering said Bill of Complaint, says:-

1. The Defendant denies each and every allegation contained in paragraphs one, two, and three, separately and severally.
2. The Defendant for further answer to this complaint says that he is not guilty of the matters alleged therein.


Attorney for Defendants

The Defendant demands a trial by jury.


Attorney for Defendants.

RECORDED

8-127

FARMERS' & MERCHANTS'
BANK OF POLLY, a corp.,
Plaintiff,

VS.

MRS. M. BREWTON AND
M. L. BREWTON,
Defendants,

SEPARATE ANSWER OF MRS. M.
BREWTON.

Filed July 7, 1937

R. S. Dwyer, Clerk

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon TAYLOR GLASS to appear within thirty (30) 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 FARMERS & MERCHANTS BANK OF FOLEY.

WITNESS my hand this 12 day of July, 1937.

R. J. Smith
Clerk

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FARMERS & MERCHANTS BANK OF
FOLEY, a Corporation,

Plaintiff,

vs.

TAYLOR GLASS,

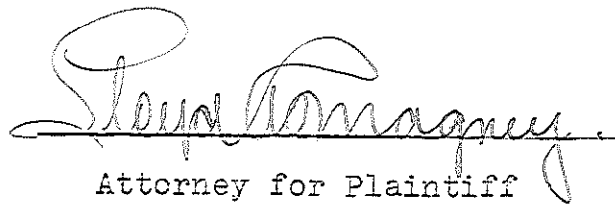
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COMPLAINT

1. Plaintiff claims of the Defendant ONE HUNDRED TWENTY FOUR & 04/100 (\$124.04) DOLLARS due from him by a promissory note, dated September 5th, 1936, and due May 5th, 1937, with the interest thereon.
2. Plaintiff avers that the said note was made by the Defendant to the order of B. A. Simms and R. T. Marshall and that the Plaintiff purchased the said note for value and before maturity from the said B. A. Simms and R. T. Marshall, who endorsed the same to the Plaintiff and the Plaintiff is now the legal holder and owner of said note.
3. Plaintiff avers that in, by and as a part of said note, the Defendant waived as to said debt, all right of exemption under the Constitution and Laws of the State of Alabama or any State as to personal property, and of such exemption the Plaintiff now claims the benefit.

4. Plaintiff further avers that in, by and as a part of said note, the Defendant agreed to pay all costs of collecting, securing or attempting to collect or secure said note, including a reasonable attorney's fee; that the sum of TWENTY FIVE & 00/100 (\$25.00) DOLLARS is such reasonable attorney's fee and the Plaintiff claims of the Defendant the further and additional sum of TWENTY FIVE & 00/100 (\$25.00) DOLLARS as such attorney's fee.


Attorney for Plaintiff

RECORDED
8-89

I have Executed this writ
by leaving copy of same on
Taylor Glass Defendant this
5th day of July 1937
Horner Walters
D.S.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FARMERS & MERCHANTS BANK OF
FOLEY, a Corporation,

Plaintiff,

of

TAYLOR GLASS,

Foley

Defendant.

SUMMONS AND COMPLAINT

Filed July 1st 1937
R. S. Walters
Clk

LLOYD A. MAGNEY
ATTORNEY AT LAW
FOLEY, ALABAMA

The State of Alabama,

CIRCUIT COURT

Baldwin COUNTY.

Term, 1925

No. 367

vs.

BILL OF COSTS

CLERK'S FEES			SHERIFF'S FEES		
	@	Amount		@	Amount
1 Issuing..... Summons and Complaint.....	\$1 25	1 25	1 Levying..... Attachment.....	\$3 00	
2 Issuing..... copies thereof.....	30	30	2 Entering and returning..... Attachment.....	25	
3 Making every copy thereof, when over 200 words, per 100 words.....	15		3 Summoning..... garnishee and return.....	1 50	
4 Entering..... Sheriff's return or copy thereof.....	20	20	4 Serving..... Summons and Return.....	1 50	1 50
5 Docketing cause, to be charged but once.....	25	25	5 Serving..... Subpoenas.....	65	
6 Entering Appearance.....	20	20	6 Impaneling jury.....	75	
7 Filing..... pleas, demurrer and other pleadings, for each.....	10	30	7 Making deed.....	2 50	
8 Every trial, with or without jury, and its incidents, not including judgments by default or nil dicit.....	75	75	8 Serving Summons, forcible entry, etc.....	1 50	
9 Entering..... Continuance (each).....	10		9 Executing writ of restitution or possession.....	5 00	
10 Entering..... judgment, (each).....	30		10 Collecting execution for cost.....	1 50	
11 Entering any other order of Court (each).....	30	30	11 Serving..... Sci. Fa., notices, etc.....	1 50	
12 Issuing..... Scire Facias, or notice in the nature thereof (each).....	75		12 Serving any summons not provided for and return.....	1 50	
13 Issuing..... Execution or copy thereof (each).....	50		13 Serving..... attachment for contempt.....	1 50	
14 Entering return, or copy thereof, for each 100 words, 15 cts; but in no case less than.....	20		14 Taking and approving..... bond.....	1 00	
15 Recording award of arbitrators, referees, auditors, etc., for each 100 words.....	15		15 Seizing personal property in detinue.....	3 00	
16 Issuing execution or attachment thereon, and entering return.....	1 00		16 Collecting money under execution, 5% first \$200.00; 4% to \$500.00; 3% all over \$500.00.....		
17 Taking bond for certiorari supersedeas, or appeal, or copy thereof and filing same.....	75		17 Selling property attached, same for selling under execution.....		
18 Issuing..... Subpoenas for Witness (each).....	30		18 Former Sheriff's fees.....		
19 Administering an oath, not relating to a trial pending and certifying the same.....	25		Total Sheriff's Fees.....		1 50
20 Issuing..... Attachment and taking bond (each).....	1 00		RECAPITULATION		
21 Filing..... papers in attachment (each).....	10		1 Clerk's Fees.....		4 80
22 Issuing..... Summons for garnishee (each).....	50		2 Clerk's Fees.....		1 50
23 Swearing and taking examination for Garnishee and recording same, for each 100 words 15 cts; but not less than.....	50		3 Sheriff's Fees.....		
24 Order to advertise, or order of survey, or copy thereof.....	50		4 Sheriff's Fees.....		
25 Certificate of Judgment.....	50		5 Witness Fees in Circuit Court.....		
26 Recording each surveyor and surveyor's report or copy thereof, each 100 words 15 cts; but not less than.....	25		6 Justice of the Peace Fees.....		
27 Issuing..... Commission to take depositions, or copy thereof.....	75		7 Witness Fees, in Justice of the Peace Court.....		
28 Making copy of interrogatories accompanying commission.....	50		8 Commissioner's Fees.....		
29 Or for each 100 words.....	15		9 Commissioner's Residence.....		
30 Filing..... packages of depositions (each).....	10		10 Constable's Fees.....		
31 Indorsing..... package of depositions, opened (each).....	10		11 Garnishee's Fees.....		
32 Issuing..... writ of ad quod damnum or writ in the nature thereof.....	75		12 Printer's Fees.....		
33 Recording the return and inquest thereon.....	50		13 Stenographer's Fees.....		
34 Or for each 100 words.....	15		14 Trial Tax.....		3 00
35 Issuing..... Writ of certiorari, prohibition, mandamus, or writ in the nature thereof.....	75		Total Fees.....		8 80
36 Filing the same and entering return.....	15		15 Judgment.....		
37 Making a complete record of a cause or copy thereof, for each 100 words.....	15	3 00	16 Date.....		
38 Making copy of any paper not herein provided for, for each 100 words.....	15		17 Interest.....		
39 Making each certificate requiring the seal of office, and affixing seal.....	50	4 80	18 Damages.....		
40 Taking any bond not otherwise provided for.....	75		Total Judgment.....		
41 Making..... necessary certificates not otherwise provided for (each witness).....	25		Interest and Damages.....		
42 For certifying abstract, in lieu of fees for transcript under section 2851 of the Code.....	5 00		Grand Total.....		11 13 8
43 Record for Supreme Court, for each 100 words.....	15				
44 Each additional copy thereof, for each 100 words.....	05				
45 Collecting money on judgments wherein said judgment has not been paid within 30 days after rendition, one half the per cent allowed sheriffs for same services for collecting money on execution.....					
Total Clerk's Fees.....					