

527

STATE OF ALABAMA :
BALDWIN COUNTY :

To any sheriff of the State of Alabama:

You are hereby commanded to summon T. J. Davidson, 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 Swift & Company, a corporation.

Witness my hand, this 8th day of July, 1939.

R. S. Duck
Clerk of the Circuit Court

Ry. Wallace Thompson
Dputy Clerk

SWIFT & COMPANY, a corporation,

Plaintiff,

-Vs-

T. J. DAVIDSON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

1. Plaintiff claims of the defendant the sum of \$277.80, the balance due from him by a promissory note for \$307.80, executed by the defendant on, to-wit, April 13, 1938 and payable to the plaintiff in thirty (30) installments of \$10.00 each, the first of said installments being payable on June 1, 1938, and one installment being payable every thirty (30) days thereafter, and said note provides that upon default in payment of any installment all remaining installments shall forthwith become due and payable, and plaintiff alleges that said sum of \$277.80, with interest at 6% per annum, is still due and unpaid.

2. Plaintiff claims of the defendant the sum of \$50.00 as an attorney's fee for collecting the money sued for in Count 1, the defendant having agreed in and by said note to pay all costs of collection, including 15% attorney's fee, and plaintiff says that \$50.00 is reasonable, due and unpaid.

Plaintiff says that in and by the note sued on in Count 1, the defendant waived all right of exemption of personalty under the laws and constitution of the state of Alabama, or any other state, and for all the money sued for in Counts 1 and 2 above, plaintiff desires to have the benefit of said waiver.

Sidney J. Gray
Attorney for Plaintiff

Defendant's address:
Bay Minette, Alabama.

SUMMONS & COMPLAINT.

RECORDED

SWIFT & COMPANY, a Corp.,
Plaintiff,

vs.

J. J. DAVIDSON,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NUMBER 527

Filed this 8th day of
July, 1939,
R. S. DUCK, Clerk,
BY: *Paul H. Hannon*
Deputy Clerk.

7/8/39
wks.

RECORDED

8-379

Executed July 10th 1939
in presence of within Summons etc.

J. J. Davidson

W. C. H. H. H.
John C. H. H. H. Deputy Sheriff

SWIFT & COMPANY, a Corp.

Plaintiff.

vs.

IN CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

T. J. Davidson,

Defendent.

Comes the defendent in the above styled cause, and answering plaintiff's complaint, says that the matters therein alleged are untrue.

T. J. Davidson
Defendent.

The defendent demands a trial
by Jury of the foregoing cause.

T. J. Davidson
Defendent.

RECORDS

8-379

RECORDED

SWIFT & COMPANY, a corp.

Plaintiff.

vs

T. J. Davidson,

Defendant.

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

ANSWER.

Filed this 9th day of August
1939

R. S. Duck, Clerk.

By R. S. Duck Deputy.