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SUMMONS AND COMPLAINT

THE STATE OF ALABAMA)

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA: GREETING:

You are hereby commanded to summon T. M. COOPER and ELMER COOPER 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 JOE REDING.

Witness my hand, this 25th day of October, 1940.

R. S. Ditch

Clerk.

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COMPLAINT

JOE REDING,

Plaintiff.

-VS-

T. M. COOPER and ELMER
COOPER.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

COUNT ONE: The Plaintiff claims of the Defendant the sum of ONE HUNDRED SEVENTY FIVE & 03/100 DOLLARS (\$175.03) due by chattel note and mortgage made by them on the 19th day of February, 1932 and payable on the 15th day of June, 1938, with interest thereon, which amount is the balance due on said note and mortgage.

The Defendant in and by said note and mortgage, waives all right of exemption under the laws of the State of Alabama as to all personalty and wages as against the collection of any indebtedness secured hereby, and they further agree to pay every expense incurred in any way or manner, as well as attorneys' fee to carry on said litigation, and also to pay all collector's fees and costs of collecting any amount due under this paper; and the Plaintiff claims of the defendants the further and additional sum of Fifty Dollars (\$50.00) as a reasonable attorneys' fee in the premises.

ATTORNEY FOR PLAINTIFF

RECORDED

Summons + Complaint

Received in Sheriff's Office
this 25 day of October, 1940
W. R. STUART, Sheriff

Executed this 26th day
of Oct. 1940 by serving
a copy of within summons
and complaint on
T. M. Cooper and
Elmer Cooper

W. R. Stuart
Sheriff
By O. J. Fucina
D.A.

Filed October 25, 1940.
R. S. Dush, Clerk

JOE REDING,

Plaintiff,

VS.

T. M. COOPER and
ELMER COOPER,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

Now come the Defendants, and for answer to the Plaintiff's complaint,
and to each allegation thereof, separately and severally, say:

ONE: That they are not guilty.

TWO: That the facts therein alleged are untrue.

BEEBE & HALL,

By: 

Attorneys for Defendants.

Defendants demand a trial by Jury

BEEBE & HALL,

By: 

Attorneys for Defendants.

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RECORDED

ANSWER:

JOE REDING,
Plaintiff,
VS.

T. M. COOPER and
ELMER COOPER,
Defendants.

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

Filed November 26, 1940
R.S. Darr, Clerk

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