

630

STATE OF ALABAMA :
COUNTY OF MOBILE :

TO ANY SHERIFF OF THE STATE OF ALABAMA...GREETING:

You are hereby commanded to summon M. H. GRIMES to appear before the Circuit Court of said County, at the place of holding the same, within thirty days from the service of this writ, then and there to answer the complaint of FRANK M. BELL, hereto attached.

Witness my hand this 30th day of November, 1940.

R. S. Duck (CLERK)

: : :

FRANK M. BELL,
Plaintiff,

vs.

M. H. GRIMES,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

COUNT ONE: Plaintiff claims of the Defendant the sum of One Hundred and Twenty-seven and 55/100 (\$127.55) Dollars, due from him by promissory waive note made by him on the 19th day of September, 1939, and payable the 1st day of May, 1940, which sum of money with the interest thereon at 6% per annum from maturity, is still due and unpaid.

The Plaintiff admits a credit of Five and 00/100 (\$5.00) Dollars on the 5th day of July, 1940, and avers that there is a balance of One Hundred and Twenty-two and 55/100 (\$122.55) Dollars due and unpaid.

Plaintiff avers that in and by the terms of the note hereinabove sued upon the Defendant waived all right to claim personal property as exempt from execution and sale or other process issued for the collection of same, and agreed to pay all costs of collecting, securing or attempting to collect or secure said note, including a reasonable attorney's fee, which Plaintiff claims, to-wit, \$25.00.

M. H. Grimes
ATTORNEY FOR PLAINTIFF

Defendant's address:
Daphne, Alabama.

RECORDED

Summons & Complaint

VS

M. H. GRIMES, Defendant

M. H. Gruin's
the defendant

By W.R. Stuart Sheriff
M.B. Hamilton Deputy Sheriff

Filed November 30, 1946
R. S. Duch, Clerk

FRANK M. BELL,

Plaintiff,

VS.

M. H. GRIMES,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

DEMURRER.

Now comes the Defendant in the above entitled cause
and for demurrer to the Complaint filed in the said cause, and to
each and every count there of separately and severally says:

1. It does not state a cause of action.

J. T. Blackburn
Attorney for Defendant.

Defendant demands a trial of
said cause by jury.

J. T. Blackburn
Attorney for Defendant.

RECORDED

DEMURRER.

FRANK M. BELL,

Plaintiff,

VS.

M. H. GRIMES,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

Filed January 29, 1941
R. S. Dorch, Clerk

630

RECORDED

DEMURRER.

FRANK M. BELL,

Plaintiff,

VS.

M. H. GRIMES,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

Filed January 29, 1941
R. S. Dorch, Clerk

130