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E. P. Jacobs, Mrs. Annie D. Harris,
and Mrs. Fletcher Benham, Partners,
doing business under the trade name
of JACOBS MANUFACTURING COMPANY,

IN THE CIRCUIT COURT OF

PLAINTIFFS,

VS

BALDWIN COUNTY, ALABAMA

C. L. Matthews and C. D. Sweat, in-
dividually, and as partners doing
business under the name of ROBERTS-
DALE HARDWARE COMPANY and ROBERTS-
DALE HARDWARE COMPANY, a partnership
composed of C. L. Matthews and C.
D. Sweat,

DEFENDANTS.

And now come the Defendants and for answer to the Plaintiff's
Complaint and to each count thereof, separately and severally, say:

1.

That the facts therein alleged are untrue;

2.

That the Defendants are not indebted to the Plaintiff in
manner and form alleged.

BEEBE & FALL

By: A. M. Hall
Solicitors for Defendants.

Defendants demand a trial by jury.

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Jury

RECORDED

Feb-Mar 10/14
Paid -
Out -

STATE OF ALABAMA
BALDWIN COUNTY

To any Sheriff of the State of Alabama:

You are hereby commanded to summon C. L. Mathews and C. D. Sweat, individually, and as partners doing business under the name of ROBERTSDALE HARDWARE COMPANY and ROBERTSDALE HARDWARE COMPANY, a partnership composed of C. L. Mathews and C. D. Sweat, 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 E. P. Jacobs, Mrs. Annie D. Harris and Mrs. Fletcher Benham, Partners, doing business under the trade name of JACOBS MANUFACTURING COMPANY.

Witness my hand, this 6th day of February, 1942.

R. S. Smith
Clerk of the Circuit Court

E. P. Jacobs, Mrs. Annie D. Harris,
and Mrs. Fletcher Benham, Partners,
doing business under the trade name
of JACOBS MANUFACTURING COMPANY,

PLAINTIFFS,

VS

C. L. Mathews and C. D. Sweat, in-
dividually, and as partners doing
business under the name of ROBERTS-
DALE HARDWARE COMPANY and ROBERTS-
DALE HARDWARE COMPANY, a partner-
ship composed of C. L. Mathews and
C. D. Sweat,

DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

COUNT I

Plaintiffs claim of the defendants \$78.64 due by promissory note made by them on the 25th day of January, 1941 and payable on the 25th day of July, 1941, with interest thereon.

COUNT II

Plaintiffs claim of the defendants \$78.64 due by promissory note made by them on the 25th day of January, 1941 and payable on the 25th day of August, 1941, with interest thereon.

COUNT III

Plaintiffs claim of the defendants \$78.64 due by promissory note made by them on the 25th day of January, 1941 and payable on the 25th day of September, 1941, with interest thereon.

COUNT IV

Plaintiffs claim of the defendants \$78.64 due by promissory note made by them on the 25th day of January, 1941 and payable on the 25th day of October, 1941, with interest thereon.

COUNT V

Plaintiffs claim of the defendants \$78.64 due by promissory note made by them on the 25th day of January, 1941 and payable on the 25th day of November, 1941, with interest thereon.

COUNT VI

Plaintiffs claim of the defendants \$78.64 due by promissory note made by them on the 25th day of January, 1941 and payable on the 25th day of December, 1941.

COUNT VII

Plaintiffs claim of the defendants \$75.00 as an attorney's fee for collecting the money sued for in Counts I, II, III, IV, V, VI, the defendants having agreed in and by said notes to pay 15% on the principal and interest as attorney's fee and plaintiffs say that said amount is due and unpaid.

Plaintiffs say that in and by said notes sued on in Counts I, II, III, IV, V, VI, and VII, the defendants waived all rights of exemption under and by virtue of the Constitution or Laws of this State or any other State and for all of the money sued for in Counts I, II, III, IV, V, VI, and VII, plaintiffs desire to have the benefit of said waiver.

COUNT VIII

Plaintiffs claim of the defendants the sum of \$1.94 due from them by account on to-wit October 11, 1941, which sum of money, together with interest thereon, is still unpaid.

Sidney J. Gray
ATTORNEY FOR PLAINTIFF

Defendant's Address:

Robertsdale, Alabama

THE STATE OF ALABAMA
COUNTY OF MONROE
I, the undersigned, being a duly qualified and sworn member of the Alabama Bar, do hereby certify that the foregoing is a true and correct copy of the original of the same as the same appears in the records of the County Clerk of the County of Monroe, Alabama.

Executed by serving a copy or the within Summons & Complaint
on C.L. Matthews and C.D. Sweat, individually, and a copy on the Robertsdale
Hardware Company, by personal service on C.D. Sweat, a member of the firm
of the Robertsdale Hardware Company, a partnership composed of C.L. Matthews
and C.D. Sweat. This the 9th day of February 1942.

W.R. Stuart
Sheriff of Baldwin County

Received in Sheriff's Office
this 6 day of Feb., 1942
W. R. STUART, Sheriff

RECORDED

1000 Feb 11 1942
Pro Duck

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Civil

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Civil

C.L. Matthews

C.D. Sweat

Robertsdale

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