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CHARLES F. SCHEUERMAN and
L. B. SCHEUERMAN, doing
business as the
MARINE SPECIALTY COMPANY,
Plaintiffs,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO.

VS.

PHIL A. BRADY,
Defendant.

COUNT ONE

The Plaintiffs claim of the Defendant the sum of *to-wit*,
Ninety-one and 44/100 (\$91.44) Dollars, together with
the interest thereon, that heretofore and on to-wit:
the 13th day of February, 1939, Plaintiffs and Defendant
entered into a written agreement by the terms of which
Plaintiffs sold to Defendant, and Defendant purchased
from Plaintiffs One (1) Quaker #4513 Heater with Ther-
mostat, including drum and all fittings for an agreed
consideration of to-wit Ninety-one and 44/100 (\$91.44)
Dollars, said sum to be paid in six (6) consecutive
monthly installments of, to-wit Fifteen and 24/100 (\$15.24)
Dollars; the first of said installments being due and
payable on the 13th day of February, 1939, and the re-
mainder of said installments on the first day of each
consecutive calendar month thereafter, until the entire
purchase price, together with the interest thereon was
paid in full.

Plaintiffs further aver that although Plaintiffs
delivered said property pursuant and according to the
terms of the said agreement, Defendant has wholly failed
and refused to pay the said sum of money as aforesaid,
although the full amount of said purchase price is over-
due and unpaid; hence this suit.

Plaintiffs further aver that under and by the terms
of the agreement as aforesaid, Defendant waived all right
to have exempted to him and all property under the Constitution
and Laws of the State of Alabama and further agreed to pay
all costs of collecting the amounts due under this agreement,
including a reasonable attorneys fees.


Attorney for Plaintiffs

Service of process may be had on Defendant at Fairhope, Alabama

7X3

marine Speciality
Us

Phil A Brady
Gairtop

7X3

Filed Nov 15-1941
Asst. Sect.
clerk

RECORDED

Received in Sheriff's Office
this 15 day of Nov., 1941
W. R. STUART, Sheriff

Executed 11-17 1941
by serving copy of within Summons and
Complaint on

Phil A. Brady

W. R. Stuart

Sheriff

By B. J. Finner Deputy Sheriff

STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED to summon PHIL A. BRADY 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 CHARLES F. SCHEUERMAN and L. B. SCHEUERMAN, doing business as the Marine Specialty Company.

Witness my hand this the 13th day of November, 1941.


Clerk