

825

SWIFT & COMPANY, a Corporation

PLAINTIFF

VS

J. M. CLEMMONS

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

#835

And now comes the Defendant, and for answer to the Complaint, and to each count thereof, separately and severally, says that he pleads in short, by consent, the general issue with the right to introduce in the evidence such facts and matters as would be admissable if well pleaded.

The Defendant demands a trial by Jury.

BEEBE & HALL

By *Shuckee*
Attorneys for the Defendant.

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. M. CLEMMONS 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 AND COMPANY.

WITNESS my hand this 28 day of July, 1943.

R. S. Smith

Clerk

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SWIFT and COMPANY, a Corpora-
tion

Plaintiff,

vs.

J. M. CLEMMONS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

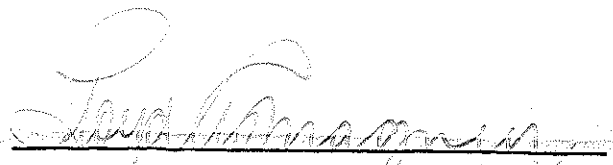
COMPLAINT

1. The Plaintiff claims of the Defendant TWO HUNDRED THIRTY & 00/100 (\$250.00) DOLLARS, the balance due by promissory note, made by him on the 3rd day of April, 1942, and payable on the 1st day of June, 1942, with interest thereon.

2. The Plaintiff avers that in, by and as a part of the note here sued upon, the Defendant waived all right to exemption under the Laws of the State of Alabama, and of such waiver, Plaintiff now claims the benefit.

3. The Plaintiff further avers that in, by and as a part of the note here sued upon, the Defendant agreed "Should this note be unpaid at maturity and placed in the hands of an attorney for collection, then there shall also become due, as a part of the principal hereof, reasonable attorneys fees." The Plaintiff further avers that said note was unpaid at maturity and also placed in the

hands of an attorney for collection and that the sum of FORTY DOLLARS (\$40.00) is a reasonable attorney's fee and the Plaintiff claims the further and additional sum of FORTY DOLLARS (\$40.00) as such attorney's fee.



Attorney for Plaintiff

82.6

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SWIFT and COMPANY, A Corpo-
ration,

Plaintiff,

vs.

J. M. CLEMMONS,

Defendant.

COMPLAINT

Received in Sheriff's Office

this 28 day of July, 1943
W. R. STUART, Sheriff

filed July 28/1943
G. M. Clemmons
J. M. Stuart
J. M. Stuart

LLOYD A. MAGNEY
ATTORNEY AT LAW
FOLEY, ALABAMA

Executed July 28 19 43
by serving copy of within Summons and
Complaint on

J. M. Clemmons

W. R. Stuart Sheriff
by Tracy Hall Deputy Sheriff

(588)