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STATE OF ALABAMA,
COUNTY OF BALDWIN

L A W
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA-GREETING:

You are hereby commanded to summon E. H. KIRBY to appear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer, or demur, within thirty days from service hereof to the Complaint of WOFFORD OIL DIVISION OF PURE OIL COMPANY, INC.

Witness this the 14 day of January, 1947.

Alice J. Duck
Clerk

WOFFORD OIL DIVISION OF
PURE OIL COMPANY, INC.
Plaintiff

IN THE CIRCUIT COURT

OF


BALDWIN COUNTY, ALABAMA

Vs.

E. H. KIRBY,
Defendant.

COMPLAINT.

COUNT ONE....The PLAINTIFF claims of the DEFENDANT the sum of ONE HUNDRED FORTY SIX AND 53/100 DOLLARS due by promissory note made by him on the 2nd day of August, 1946 and due and payable on the 19th day of December, 1946, with interest thereon. The Plaintiff further avers that as a part of the consideration for said note the Defendant would as to this debt waive all of his rights of exemption as to personal property granted him under the constitution and laws of the State of Alabama and further agreed to pay a reasonable attorneys fee for the collection of this debt, which the Plaintiff claims of the Defendant in the sum of TWENTY-FIVE DOLLARS.


RICKARBY & RICKARBY
Attorneys for the Plaintiff

DEFENDANT'S ADDRESS.
DEFENDANT lives at Fairhope, Alabama
Works for The Grand Hotel.

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WOFFORD OIL DIVISION OF PURE
OIL COMPANY, INC.
Plaintiff

vs

E. H. KIRBY
Defendant

SUMMONS AND COMPLAINT

Served on 1-10-47
Serving copy of within Summons and
complaint on
E. H. Kirby

C. E. Garrett Sheriff
By H. F. Hall Deputy Sheriff

Filed

1-14-47

Alice J. Duck
clerk

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