

8411

STATE OF ALABAMA
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon H. Dugger 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 W. N. DYER.

Witness my hand on this 2nd day of December, 1943.

R. Bluch
Clerk.

W. N. DYER,

PLAINTIFF

VS
H. Dugger

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

1.

The Plaintiff claims of the Defendant NINE HUNDRED TWENTY
balance
FIVE AND 89/100 DOLLARS (\$925.89) due by promissory note made by him on the
11th day of January, 1942, and payable on the first day of July, 1942, with
interest thereon from date.

The Plaintiff alleges that the Defendant, in and by said
note, waived all exemption under the laws of the State of Alabama, as to
personal property, and agreed to pay a reasonable attorneys fee for collecting
or attempting to collect said note.

2.

The Plaintiff claims of the Defendant the further sum of
ONE HUNDRED AND FIFTY DOLLARS as a reasonable attorneys fee.

BEEBE & HALL

By S. M. Hall
Attorneys for the Plaintiff.

Executed 12/19 1943
by serving copy of within Summons and
Complaint on

H. Duggen

W. P. Stewart Sheriff

By _____ Deputy Sheriff

841

W. N. DYER,
COMPLAINANT

VS

H. X DUGGER
DEFENDANT.

SUMMONS AND COMPLAINT.

3 added Dec 2, 1943
Robert
Quinn

12/19/43

W. N. DYER,

Plaintiff,

VS.

H. DUGGAR,

Defendant.

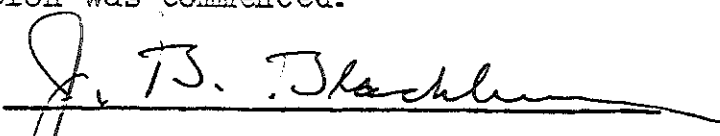
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NUMBER 841.

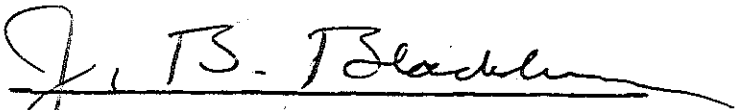
PLEAS

Now comes the Defendant and for answer to the Complaint
filed herein says:

1. Not guilty.
2. He has paid the debt for the recovery of which this
suit was brought before the action was commenced.


Attorney for Defendant.

Defendant demands a trial of said
cause by jury.


Attorney for Defendant.

PLEA

W. N. DYER,

Plaintiff,

VS.

H. DUGGER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NUMBER 841.

*3002 29 1944
Dugger*

W. N. DYER,

Plaintiff,

VS.

H. DUGGER.

Defendant.

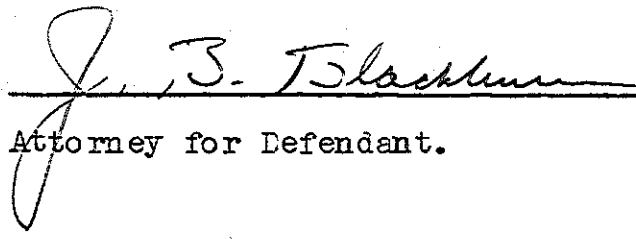
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PLEA

A. The Defendant, for further answer to the Complaint saith: That the note here sued on was materially altered or changed by the Plaintiff, or by someone acting for the said Plaintiff, without the knowledge or consent of the Defendant, in that the amount of the said note was raised from Thirty-eight Dollars (\$38.00) to the amount now shown by the said note and that this said alteration has not been ratified by the Defendant in any way, because of which the Defendant is not liable thereon.


Attorney for Defendant.

PLEA

W. N. DYER,

Plaintiff,

VS.

H. DUGGER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW. NO. 841.

Index March 20th 1944.
[Signature]

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