

1098

CAMELLA N. HOOPER, As
Executrix of the Estate
of L. J. Hooper, deceased,

Plaintiff,

VS.

HOWARD LOVETT,

Defendant.

NO. _____

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

DEMURRER.

Now comes the Defendant, by his attorney, Telfair
J. Mashburn, Jr., and demurs to the complaint heretofore
filed in said cause, and for grounds for said demurrer,
sets forth the following separate and several reasons, to-wit:

1: Because the Complaint does not state a cause of
action.

Telfair J. Mashburn, Jr.
Attorney for Defendant.

C O P Y.

RECORDED

NO. 1098

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

CAMELLA N. HOOPER, As
Executrix of the Estate
of L. J. Hooper, deceased,

Plaintiff,

VS.

HOWARD LOVETT,

Defendant.

DEMURRER.

FILED

OCT 23 1947

ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

No. _____

TERM, 194_____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HOWARD LOVETT

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against _____

Howard Lovett, _____, Defendant....

by Camella N. Hooper, as Executrix of the Estate of L. J. Hooper,
deceased, _____ Plaintiff....

Witness my hand this 26 day of Sept 1947

Beice J. Hensch, Clerk

No. 1098

Page _____

THE STATE of ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

Camella N. Hooper, as executrix
of the estate of L.J. Hooper,
Deceased. Plaintiffs

vs.

Howard Lovett

Defendants

SUMMONS and COMPLAINT

Filed _____

, 194_____

FILED
SEP 25 1947

Clerk

ALICE M. DUCK, Clerk

W. C. Beebe.

Plaintiff's Attorney

Defendant's Attorney

Moore Printing Co., Day Minetto, Ala.

Defendant lives at _____

RECEIVED IN OFFICE

, 194_____

Sheriff

I have executed this summons

this _____

, 194_____

by leaving a copy with _____

Sheriff

Deputy Sheriff

CAMELLA N. HOOPER, AS
Executrix of the Estate
of L. J. Hooper, deceased,
PLAINTIFF,

VS

HOWARD LOVETT,
DEFENDANT.

(IN THE CIRCUIT COURT OF
(
(BALDWIN COUNTY, ALABAMA,
(

(AT LAW.
(
(

FIRST

Plaintiff claims of the Defendant the sum of Eighty-six Dollars and Twenty-eight Cents (\$86.28) due by promissory note made by him on December 12, 1941, payable on the 12th day of February, 1942, with interest thereon.

SECOND

Plaintiff claims of the Defendant the further and additional sum of Twenty-seven Dollars and Seventy-five Cents (\$27.75) due on a note made by him on the 10th day of December, 1941 to the Baldwin County Bank payable January 20, 1942, which note was endorsed by the said L. J. Hooper, now deceased, and which note was not paid by the said maker when the same became due and the said L. J. Hooper, as endorser, was called upon and did pay the same and the said note, with interest thereon, is still due and unpaid.

Plaintiff further alleges that in and by the said notes the said Defendant agreed to pay all cost of collection, including a reasonable attorney's fee and the Plaintiff claims the further and additional sum of Twenty-five Dollars (\$25.00) as attorney's fee in the premises.

Plaintiff further alleges that in and by the said notes the said Defendant waived all right of exemption as to personal property and the Plaintiff claims the benefit of the said waiver.


Attorney for Plaintiff.

Received in Sheriff's Office
this 26 day of Sept, 1947
TAYLOR WILKINS, Sheriff
Executed 9-30-47
by serving copy of within Summar
Complaint on
Howard Lovett
Taylor Wilkins
By 147 Hall