LAW OFFICE OF



FOREST A. CHRISTIAN FOLEY, ALABAMA

April 8, 1948

Mrs. Alice J. Duck Clerk of Court Bay Minette, Alabama

> Re: Thomas Steele vs. Claude Peteet Civil Action No. 1159

Dear Mrs. Duck:

Kindly dismiss the case mentioned above without prejudice, which case was sued on notes.

I am enclosing a blank check for the court costs.

Yours very truly

Enclosure...

THE STATE OF ALABAMA,

BAIDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon CLAUDE PETEET to appear within thirty days from the service of this writ in the Circuit Court to be helf for said County at the place of holding same, then and there to answer, plead or demur, the complaint of THOMAS L. STEELE.

Witness my hand this the 15th day of March, 1948.

Alice L. Duck

THOMAS L. STEELE,

Plaintiff

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA

CLAUDE PETEET.

Defendant

IN LAW

COMPLAINT

The Plaintiff claims of the Defendant the sum of ONE THOUSAND DOLIARS (\$1,000), due by two promissory notes made by him on the 7th day of August, 1945, each in the principal amount of \$500.00, one payable on the 7th day of August, 1946, and one payable on the 7th day of August, 1947, with interest thereon from the 7th day of August, 1946, at the rate of six per cent (6%) per annum until paid.

In, by and as a part of said note the Defendant waives all rights of exemption under the Constitution and Laws of the State of Alabama or any other State in the United States, and agrees to pay for the advertising, selling, conveying and attorney's fees, which fee plaintiff alleges to be \$150.00, and claims herewith.

Thomas L. Steele, Plaintiff

HARLY WING IN

orest A. Christian, Foley, Alabama Attorney for Plaintiff

There is attached hereto and made a part hereof an itemized statement of the amount of this claim, verified by the affidavit of a competent witness.

Made before and certified to by a Notary Public which shows the amount owed on this claim as of March 13, 1948.

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THE STATE OF ALABAMA,

BALDWIN COUNTY.

AFFIDAVIT OF THOMAS L. STEELE

Thomas L. Steele, first being duly sworn, deposes and says as follows:

That he is the Plaintiff in the case of Thomas L. Steele vs. Claude Peteet, that on August 7, 1945, Claude Peteet executed two notes to him, each in the amount of \$500.00, one which was payable on or before one year from date and the other due and payable on or before two years from date, that the said notes provide for interest at the rate of six per cent (6%) per annum, from date until paid, and they also provide for waiver of exemptions and a reasonable attorney's fee; and that he has employed Forest A. Christian as attorney to collect said notes. The Defendant has paid \$115.50 on said notes, which was applied to delinquent interest. Accordingly, the Defendant owes interest from August 7, 1946, to date.

Romas I Steele

Sworn to and subscribed before me, a Notary Public, this the 1348.

to Not over Biblio

Notary Public

THE STATE OF ALABAMA, BALDWIN COUNTY.

AFFIDAVIT OF FOREST A. CHRISTIAN

Forest A. Christian, first being duly sworn, deposes and says as follows:

That he is a duly licensed attorney practicing in Foley, Alabama, and as such attorney, he knows the fees charged by members of the Bar in the various legal matters, and that he believes that a fee of \$150.00, is reasonable in the case of Thomas I. Steele vs. Claude Peteet, and that these notes were delivered to him for collection more than two months ago and that he has had considerable expense in attempting to collect these notes without suit.

July Muls/14

Sworn to and subscribed before me, a Notary Public, this the 15 and day of March, 1948.

Notary Public

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Received in Sheriff's Office this 15day of May, 1948 TAYLOR WILKINS, Sheriff

by serving copy of within Summons and Complaint on

Change Petert

Joyla Wilhins Sheriff

SUMMONS AND COMPLAINT

THOMAS L. STEELE,

Plaintiffat

VS.

CLAUDE PETEET,

Defendant

CIRCUIT COURT OF BALDWIN COUNTY; ALABAMA, AT LAW

FILE DE MAR 15 1948
ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

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