

LOIS D. ESTOP

PLAINTIFF

VS.

J. C. CLEMONS

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1439

Now comes the Defendant and for answer to the Complaint
in this cause and to each paragraph thereof, separately and severally
says:

1. That the facts therein alleged are untrue.
2. That the note sued on was paid in full before the
commencement of this suit.


Attorney for the Defendant

The Defendant demands a trial by Jury.


Attorney for the Defendant

RECORDED

LOIS D. ESTOP

PLAINTIFF

VS.

J. C. CLEMONS

DEFENDANT

Filed 4-17-50
Ainsworth
Clerk

SUMMONS

THE STATE OF ALABAMA,
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

YOU ARE HEREBY COMMANDED to summon J. C. CLEMMONS 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 J. C. CLEMMONS, by LOIS D. ESTOUP.

WITNESS my hand this the 17 day of November, 1949.

Alice J. Duck
Clerk

Clerk

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COMPLAINT

LOIS D. ESTOUP,

Plaintiff

VS.

J. C. CLEMMONS,

Defendant

IN THE CIRCUIT COURT OF THE
TWENTY EIGHTH JUDICIAL CIRCUIT
OF ALABAMA - AT LAW

The Plaintiff claims of the Defendant the sum of NINE HUNDRED & 00/100 DOLLARS (\$900.00), due by promissory note made by him on the 14th day of December, 1948, and payable on the 15th day of July, 1949, with interest thereon at the rate of six per cent (6%) per annum, from July 15, 1949.

As a part of said note the said Defendant agreed to pay all costs of collecting or securing or attempting to collect or secure this note, including a reasonable attorney's fee, which the Plaintiff alleges to be \$135.00.

In, by and as a part of said note, the Defendant waives all right of exemption under the Constitution and Laws of the State of Alabama, or any other State, as to personal property.

Frederick Christy
Attorney for Plaintiff

The Defendant lives North of Magnolia Springs, Alabama.

Received in Sheriff's Office
17 day of Nov 1949
TAYLOR WILKINS, Sheriff

1439

RECORDED

SUMMONS AND COMPLAINT

LOIS D. ESTOUP,

Plaintiff

vs,

X31 J. C. CLEMONS,

Defendant

IN THE CIRCUIT COURT OF THE
TWENTY EIGHTH JUDICIAL CIRCUIT
OF ALABAMA - AT LAW

FILED

NOV 17 1949

ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

Returned _____ day of _____ 19____
Not found in my county, the clerk of the court and in-
quiry.

by service on _____

By _____
W. H. HOLCOMBE, Sheriff
By _____
Alice J. Duck, D.S.

on _____

I served a copy of the within _____

and on _____

Received _____

Day of _____

19____

Day of _____

March 19____

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