

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JOHN ENGLISH 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 John Kaiser.

WITNESS my hand, this 28th day of July, 1950.

Reidy J. French
Register

JOHN KAISER

PLAINTIFF

VS

JOHN ENGLISH

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW

1.

The Plaintiff claims of the Defendant THIRTEEN HUNDRED NINE DOLLARS and 82/100 (\$1309.82) due by promissory note made by him on the 30th day of November, 1949, and payable on the first day of January, 1950, with the interest thereon.

2.

The Plaintiff alleges that the Defendant in said note waived all rights of exemption under the constitution and laws of the State of Alabama and agreed to pay all costs of collecting the same, including a reasonable attorneys fee.

3.

The Plaintiff claims of the Defendant the further sum of TWO HUNDRED FIFTY (\$250.00) DOLLARS as reasonable attorney's fees.

S. L. Love
Attorney for the Plaintiff

8-4-50

RECORDED

Received in Sheriff's Office
this 3 day of July 1950
TAYLOR WILKINS, Sheriff

Executed 8-4-50 1950
by serving copy of within Summons and
Complaint on

Fahr English

Taylor Wilkins Sheriff
By Ellen Stenback Deputy Sheriff

JOHN KISER

PLAINTIFF

VS

JOHN ENGLISH

DEFENDANT

FIELD OF COMPLAINT

FILED

JUL 28 1950

JOHN L. WICK, Clerk

JOHN KAISER,

Plaintiff,

-vs-

JOHN ENGLISH,

Defendant.

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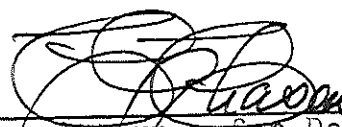
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Now comes the Defendant in the above styled cause and
for answer to the complaint filed therein, saeth:

1. That the allegations of the complaint are untrue.



Attorney for Defendant

RECORDED

1838

A N S W E R

JOHN KAISER,
Plaintiff,

-VS-

JOHN ENGLISH,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

SEP 24 1952

ALICE J. DUCK, Clerk

JOHN KAISER,

Plaintiff,

-vs-

JOHN ENGLISH,

Defendant.

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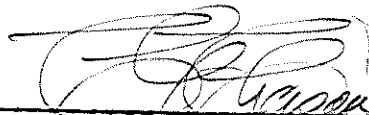
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes the defendant in the above styled cause and demurs to the complaint filed therein and to each count, separately and severally, and as grounds therefor, shows separately and severally the following:-

I. Said complaint does not state a cause of action.



Attorney for Defendant

1538 RECORDED

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D E M U R R E S

666

JOHN KAISER,

Plaintiff,

-VS-

JOHN ENGLISH,

Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

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Filed 9. 11-50
Wiegand
Clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA