

JAMES B. MOBLEY

PLAINTIFF

VS

LOUIS B. UNDERWOOD, alias
LOUIS V. UNDERWOOD

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes the defendant and demurrers to counts one, two, and three
of the plaintiff's complaint for reason that said counts of said complaint
fail to state a cause of action.


Attorney for the Plaintiff

1712

JAMES B. MOBLEY

PLAINTIFF

VS

LOUIS V. UNDERWOOD

DEFENDANT

DEMURRERS

FILED
FEB 7 1952
ALICE J. DUCK, Clerk

RECEIVED
FEB 10 1952
CLERK OF COURT

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LOUIS V. UNDERWOOD 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 JAMES B. MOBLEY.

WITNESS my hand, this 4th day of October, 1951.

David L. Luck
Register

JAMES B. MOBLEY

PLAINTIFF

VS

LOUIS B. UNDERWOOD, alias
LOUIS V. UNDERWOOD

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

COUNT ONE

The plaintiff claims of the defendant Five Hundred (\$500.00) Dollars, due by promissory note made by him on the 7th day of September, 1945, and payable on the 7th day of September, 1947, with interest thereon.

COUNT TWO

The plaintiff claims of the defendant Five Hundred (\$500.00) Dollars, due by promissory note made by him on the 7th day of September, 1945, and payable on the 7th day of September, 1948, with interest thereon.

COUNT THREE

The plaintiff claims of the defendant Five Hundred (\$500.00) Dollars, due by promissory note made by him on the 7th day of September, 1945, and payable on the 7th day of September, 1949.

The plaintiff alleges that the defendant in each of said notes waives on exemption as to personal property and agreed to pay a reasonable attorney fee.

The plaintiff claims of the defendant the further sum of Two Hundred Fifty (\$250.00) Dollars as the reasonable attorney fee.

Levin Thompson
Attorney for the Plaintiff.

Received in Sheriff's Office
this 5 day of Oct, 1951
TAYLOR WILKINS, Sheriff

W 1712

Returned 7 day of Dec 1951
not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff
By H F Hall
Deputy Sheriff

JAMES D. MOLEY

PLAINTIFF

VS

LOUIS B. UNDERWOOD

DEFENDANT

Executed Jan., 10. 1952
By Sending Copy on
Louis. B. Underwood

2141

Sheriff
Taylor Wilkins
By
Edleigh Steadham

From the law offices of
Cliff Lenoir Thompson
Daytona, Alabama

FILED

OCT 4 1951

ALICE J. DUCK, Clerk