

1805

STATE OF ALABAMA)
BALDWIN COUNTY) IN THE CIRCUIT COURT LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summons Eugene A. Koehle to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of Wild Brothers Hardware Company.

WITNESS my hand this 17th day of May, 1952.

W. J. W. W.
Clerk

- COMPLAINT -

WILD BROTHERS HARDWARE COMPANY,	I	IN THE CIRCUIT COURT OF
Complainant,	I	BALDWIN COUNTY, ALABAMA
-vs-	I	LAW SIDE
EUGENE A. KOEHLE,	I	
Defendant.	I	

The Plaintiff claims of the Defendant Seven Hundred Three & no/100 Dollars (\$703.00) due by Promissory Note made by him on, to-wit, October 15, 1951, and due on, to-wit, January 15, 1951, with interest thereon at the rate of eight per cent (8%) per annum from January 15, 1951.

The Plaintiff avers that in and by the terms of the said note, the Defendant waived all right to exemption under the Constitution and laws of Alabama or any other state as to personal property and of this waiver the Plaintiff now claims the benefit.

The Plaintiff further avers that in and by the terms of said note, the Defendant agreed to pay all cost of collecting or securing or attempting to collect or secure this note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of \$115.00 as such reasonable attorney's fee.

W. J. W. W.
(Attorney for Complainant)

TAYLOR WILKINS, Sheriff

Executed May. 19, 1952
By Serving Copy on

Eugene A. Koehle

Sheriff
Taylor Wilkins
By
Edleigh Steadham

RECORDED

SUMMONS AND COMPLAINT

WILD BROTHERS HARDWARE CO.,
Complainant,

-VS-

EUGENE A. KOEHLE,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

Filed 5-17-52
Alicia J. Jernick
Clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA