

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John Z. Davis and Aurellia T. Davis 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 J. L. Mothershead.

WITNESS my hand this 31st day of August, 1970.

Alice J. Duck
Clerk

Defendants reside at Highway 31, South, Bay Minette, Alabama.

* * * * *

J. L. MOTHERSHEAD,

Plaintiff,

VS.

JOHN Z. DAVIS and AURELLIA
T. DAVIS,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

9460

C O M P L A I N T

COUNT ONE

The plaintiff claims of the defendants Six Thousand Forty and 69/100 Dollars (\$6,040.69) due by promissory note made by them on the 15th day of January, 1969, and payable in monthly installments of \$128.71 per month for sixty months, with interest thereon.

Plaintiff avers that the defendants agreed to pay all costs of collecting the said note, including a reasonable attorney's fee, which fee he avers to be \$900.00 and which he herewith claims.

COUNT TWO

Plaintiff claims of the defendants Eighty-two and 24/100 Dollars (\$82.24) due from them by account on the 10th day of September, 1969, which sum of money with the interest thereon is still unpaid.

FILED

AUG 31 1970

ALICE J. DUCK

CLERK
REGISTER

[Signature]
Attorney for Plaintiff

9460

J. L. Mothershead

vs.

John L. Davis &
Aurellia J. Davis

Filed Aug 31, 1970

J. R. Newen

Received 3 day of Sept 1970
and on 3 day of Sept 1970
I served a copy of the within JLD
on John L. & Aurellia Davis

My service on _____

TAYLOR WILKINS, Sheriff
By R. C. Allard

ANSWER

J. L. MOTHERSHEAD,)
Plaintiff,) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA
JOHN Z. DAVIS and AURELLIA) AT LAW
T. DAVIS,) CASE NO. 9460
Defendants.)

1.

The Defendants, for answer to said Complaint, say they have paid the debt sued on before this action was commenced.

WILTERS & BRANTLEY

BY: William M Brantley
Attorneys for Defendants

The Defendants demand a trial by jury.

WILTERS & BRANTLEY

BY: William M Brantley
Attorneys for Defendants

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 10 day of Sept
1970, served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

By: William M Brantley

FILED

SEP 11 1970

ALICE J. DUCK CLERK
REGISTER