

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Eunice Blackmon
Bay Minette, Al.

DATE January 25, 1971

Re: John L. Vail, Jr. vs. Lois D. Estoup

Dear Mrs. Blackmon:

Enclosed please find Bill of Complaint to
be filed in captioned cause, together with
copy of same and summons to be served.

Sincerely,

John V. Duck
CRH/

DATE

9656
1-28-71

SIGNED

SIGNED

THIS COPY FOR PERSON ADDRESSED

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9656

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon LOIS D. ESTOUP

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.....

LOIS D. ESTOUP

... Defendant.....

by JOHN L. VAIL, JR.

..... Plaintiff.....

Witness my hand this 28 day of Jan 1971

Ernie B. Blackburn Clerk

No. 9656 Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

JOHN L. VAIL, JR.

Plaintiffs

vs.

LOIS D. ESTOUP

Defendants

SUMMONS AND COMPLAINT

Filed JAN 28 1971 19.....

Granice B. Blackmon Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
159 Short Street
Fairhope, Alabama

Received In Office

Jan 28 1971

Taylor Wilkins Sheriff

I have executed this summons

this 29 - Jan 1971

by leaving a copy with

CR

Lois D. Estoup

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY W. Crook
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. Crook Deputy Sheriff

JOHN L. VAIL, JR.,)
 Plaintiff,)
vs.)
LOIS D. ESTOUP,)
 Defendant.)

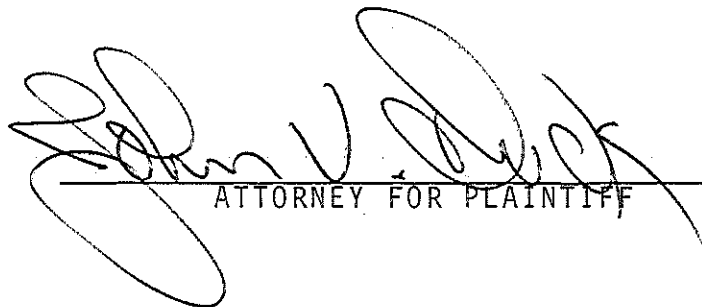
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW 9656

COUNT ONE

Plaintiff claims of the Defendant the sum of SEVEN HUNDRED FIFTY-ONE AND 20/100 (\$751.20) DOLLARS due by promissory note made by her, under seal, on the 8th day of May, 1961, and payable November 8, 1963, with the interest thereon.

That in and by the terms of said note, the Defendant agreed to pay all costs of collection, including a reasonable attorneys fee, and the Plaintiff now claims the further and additional sum of ONE HUNDRED FORTY (\$140.00) DOLLARS as a reasonable attorneys fee.

That in and by the terms of said note, the Defendant waived all rights of exemption under the Constitution and Laws of the State of Alabama, and the Plaintiff now claims the benefit of said waiver.


ATTORNEY FOR PLAINTIFF

FILED

JAN 28 1971


Clerk