

STATE OF ALABAMA Ø
COUNTY OF BALDWIN Ø

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SUMMON ALICE KEEVAN, TO APPEAR
AND ANSWER, PLEAD OR DEMUR, WITHIN THIRTY DAYS FROM THE DATE HEREOF
OF THIS SERVICE, TO THE BILL OF COMPLAINT FILED AGAINST HER IN THE
CIRCUIT COURT, AT LAW, FOR SAID COUNTY AND SAID STATE BY BARRY L.
BOOTH.

HEREIN FAIL NOT, DUE RETURN MAKE OF THIS WRIT AS THE LAW
DIRECTS.

WITNESS MY HAND THIS 15 DAY OF Feb., 1971.

Eunice B. Blackmon
CLERK

BARRY L. BOOTH Ø

PLAINTIFF Ø

VS Ø

ALICE KEEVAN Ø

DEFENDANT Ø

IN THE CIRCUIT COURT
OF
BALDWIN COUNTY, ALA.
AT LAW

CASE NO: 9689

COUNT ONE:

PLAINTIFF CLAIMS OF DEFENDANT THE SUM OF ONE HUNDRED SIX-
TY NINE AND NO/100 (\$169.00) DOLLARS, DUE BY PROMISSORY NOTE MADE
BY HER ON, HERETOFORE, TO-WIT, OCTOBER 22, 1970, WHICH SUM OF MONEY
WITH INTEREST THEREON FROM TO-WIT, FEBRUARY 1, 1971, IS DUE AND UN-
PAID; AND PLAINTIFF AVERS THAT IN AND BY THE TERMS OF SAID NOTE, THE
DEFENDANT WAIVED ALL RIGHTS OF EXEMPTION UNDER THE LAWS OF THE STATE
OF ALABAMA, AND PLAINTIFF CLAIMS THE BENEFIT OF SAID WAIVER; PLAIN-
TIFF CLAIMS THE ADDITIONAL SUM OF THIRTY-FOUR AND NO/100 (\$34.00)
DOLLARS AS A REASONABLE SUM AS ATTORNEY FEES FOR BRINGING THIS SUIT
FOR THAT THE DEFENDANT IN AND BY THE TERMS OF SAID NOTE AGREED TO
PAY A REASONABLE ATTORNEY FEE FOR THE BRINGING AND PROSECUTING OF
THIS SUIT.

FILED

FEB 15 1971

BAILEY & TAYLOR

BY: *Robert E. Taylor*
ATTORNEYS FOR PLAINTIFF

67

PAGE 163

EUNICE B. BLACKMON
CIRCUIT CLERK

242-22-71

CASE NO: 9689

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

BARRY L. BOOTH

PLAINTIFF

VS

ALICE KEEVAN

DEFENDANT

TO ANY SHERIFF OF THE
STATE OF ALABAMA:

DEFENDANT MAY BE SERVED
AT:

Rt. 1, Box 187
DAPHNE, ALABAMA 36526

Received 15 day of Jul 1971
and on 22 day of FEB 1971
I served a copy of the within SCU
on Alice Keavan
By service on ALICE KEEVAN

TAYLOR WILKINS, Sheriff
By W. C. Rook D. S.
J. G. Halloway

Sheriff claims 44 miles at
Ten Cents per mile Total \$ 4.40
TAYLOR WILKINS, Sheriff
BY J. G. Halloway
DEPUTY SHERIFF