

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon E. D. Moriarty

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 _____

E. D. Moriarty _____, Defendant

by Escambia County Bank, a corp _____

_____, Plaintiff

Witness my hand this 15th day of April 1954

_____, Clerk

No. _____ Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed _____ 19____

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19____

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

Sheriff

Deputy Sheriff

BROOKS JONES
ATTORNEY AT LAW
BREWTON, ALABAMA
TELEPHONE 1162

APRIL 14, 1954

2230

Mrs. Alice J. Duck
Clerk of the Circuit Court of
Baldwin County
Bay Minette, Alabama

Re: Escambia County Bank
vs.
E. D. Moriarity, Jr.
Promissory Note

Dear Mrs. Duck:

Enclosed you will find a Summons and Complaint and a copy thereof. If you will, please file said summons and complaint and turn it over to the sheriff for service. E. D. Moriarity, Jr. lives in Robertsedale, Alabama, and is a schoolteacher there.

Thank you very much.

Very truly yours,

Brooks Jones
BROOKS JONES

BJ:S

2230
Escambia County Bank
vs.
E. N. Moriarity

Prom. Note
H-15-54

THE STATE OF ALABAMA, Baldwin COUNTY

CIRCUIT COURT

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summons E. D. Moriarity, Jr.

to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur, within thirty days from service hereof to the complaint of the Escambia County Bank, a Corporation

Witness, this 13th day of April, 1954

W. J. French, Clerk.

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT.

COMPLAINT.

Escambia County Banka Corporation

Plaintiff

vs.

E. D. Moriarity, Jr.

Defendant

And the Plaintiff claim \$ of the Defendant E. D. Moriarity, Jr.

One Hundred Sixty-four and no/100 - - - - - Dollars
by promissory note made by him on the 23rd day of July, 1953,
and payable the 14th day of February, 1954, with interest thereon.

And Plaintiff aver \$ that in said note, and as a part thereof, the Defendant expressly waived his right to have any of his personal property exempted to him under the Constitution and Laws of the State of Alabama.

And Plaintiff avers that in said note, and as a part thereof, the Defendant expressly agreed to pay a reasonable attorney's fee if it became necessary to employ an attorney to collect said debt and the Plaintiff claims \$32.80 also as said attorney's fee, it having become necessary to employ an attorney to collect said debt.

Brooks Jones
Plaintiff's Attorney.

Received this 19 day of April, 1954
Taylor Wilkins, Sheriff.

Executed this Not Found day of _____, 19____

by leaving a copy of the within summons and Complaint with:

Defendant.

Returned 29 day of April, 1954
Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff

By Erleigh E. Hadham
Deputy Sheriff

Sheriff.

No. 2230

THE STATE OF ALABAMA

Baldwin COUNTY

CIRCUIT COURT

Escambia County Bank,

a Corporation

Plaintiff

vs.

E. D. Moriarity, Jr.

Defendant

Summons and Complaint on
Promissory Waiver Note

Filed this 13th day of

April, 1954

W. J. Jones
Clerk.

Plaintiff's Attorney.

BROOKS JONES
ATTORNEY AT LAW
BREWTON, ALABAMA
TELEPHONE 1162

March 26, 1955

Mrs. Alice J. Duck
Clerk of the Circuit Court
Baldwin County
Bay Minette, Alabama

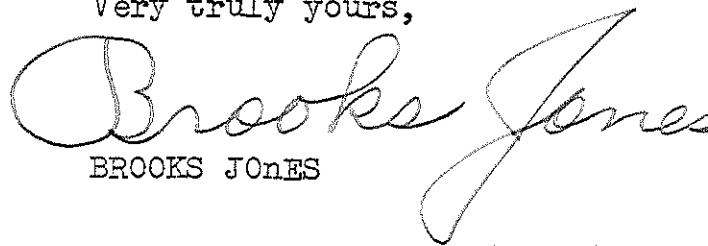
2230
Re: Escambia County Bank
vs.
E. D. Moriarity
Promissory Note

Dear Mrs. Duck:

I apologize for waiting so long to pay the costs in this case. I thought perhaps the defendant might come back to Baldwin County and we could get service on him then. However, that seems most unlikely. If you will send me a costs' bill I will mail you a check.

Thank you very much for your cooperation in this matter.

Very truly yours,


BROOKS JONES

BJ:s

THE STATE OF ALABAMA, Baldwin COUNTY

CIRCUIT COURT

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summons E. D. Moriarity, Jr.

to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur, within thirty days from service hereof to the complaint of the Escambia County Bank, a Corporation

Witness, this 13th day of April, 1954, *Alice J. Duck*, Clerk.

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT.

COMPLAINT.

Escambia County Bank	}	vs.	}	E. D. Moriarity, Jr.
a Corporation				
Plaintiff				Defendant

And the Plaintiff claim \$ of the Defendant E. D. Moriarity, Jr.

One Hundred Sixty-four and no/100 - - - - - Dollars
by promissory note made by him on the 23rd day of July, 1953,
and payable the 14th day of February, 1954, with interest thereon.

And Plaintiff avers that in said note, and as a part thereof, the Defendant expressly waived his right to have any of his personal property exempted to him under the Constitution and Laws of the State of Alabama.

And Plaintiff avers that in said note, and as a part thereof, the Defendant expressly agreed to pay a reasonable attorney's fee if it became necessary to employ an attorney to collect said debt and the Plaintiff claims \$32.80 also as said attorney's fee, it having become necessary to employ an attorney to collect said debt.

FILED

4-15-54
ALICE J. DUCK, Clerk

Brooks Jones
Plaintiff's Attorney.

Received this _____ day of _____, 19_____, Sheriff.

Executed this _____ day of _____, 19_____

by leaving a copy of the within summons and Complaint with:

Defendant.

Sheriff.

No. _____

THE STATE OF ALABAMA

Baldwin COUNTY

CIRCUIT COURT

Escambia County Bank

a Corporation

Plaintiff

vs.

E. D. Moriarity, Jr.

Defendant

**Summons and Complaint on
Promissory Waiver Note**

Filed this 13th day of

April, 1954

W. J. French
Clerk.

Plaintiff's Attorney.

Oct 1