

SUMMONS

BOOK 002 PAGE 34

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, - GREETING:

YOU ARE HEREBY COMMANDED to summon EDDIE R. SUMMERLIN, 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 EDDIE R. SUMMERLIN, by T.M. MOSS, d/b/a NEW GORDON MOTOR COMPANY.

Witness my hand this the 21st day of August 1954.

Alice J. Duck
Clerk of Court

COMPLAINT

T. M. MOSS, d/b/a NEW GORDON MOTOR)
COMPANY,)
Plaintiff)
VS:)
EDDIE R. SUMMERLIN,)
Defendant)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

The Plaintiff claims of the Defendant the sum of TWO HUNDRED SIXTEEN & 00/100 DOLLARS (\$216.00), due by chattel mortgage note made by him on the 24th day of November 1951, and due and payable on or before the 24th day of November 1952, together with interest thereon.

Said note also provides for a reasonable attorney's fee and waives all exemption under the laws and Constitution of the State of Alabama or any other State as to personal property. Plaintiff alleges the reasonable attorney's fee is \$43.00.

Dr. G. A. Miller
Attorney for Plaintiff

The Defendant resides at:
Daphne, Alabama

FILED

8-26-54
ALICE J. DUCK, Clerk

Received 26 day of Aug 1954
And on Oct 12 of Oct
I served a copy of the within Summons
on T. M. Moss

By service on Eddie R. Summerlin
Summerlin
TAYLOR WILKINS, Sheriff
By Joe Crawford

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

T. M. MOSS, d/b/a NEW GORDON MOTOR
COMPANY,

Plaintiff

VS:

EDDIE R. SUMMERLIN,
Defendant.

FILED
AUG 26 1954
ALICE L. DICK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

SUMMONS

2368

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

BOOK 003 PAGE 408

TO ANY SHERIFF OF THE STATE OF ALABAMA, - GREETING:

YOU ARE HEREBY COMMANDED to summon RALPH MORTON, 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 RALPH MORTON, by T. M. MOSS d/b/a NEW GORDON MOTOR COMPANY.

Witness my hand this the 21st day of August, 1954.

Alice L. Hinch
Clerk of Court

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COMPLAINT

T. M. MOSS d/b/a NEW GORDON MOTOR)
COMPANY,)
Plaintiff.)
VS:)
RALPH MORTON,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT I

The Plaintiff claims of the Defendant the sum of EIGHTY & 00/100 DOLLARS (\$80.00), due by chattel mortgage note made by him on the 16th day of September 1950, and due and payable on or before the 15th day of September 1953, together with interest thereon.

Said note also provides for a reasonable attorney's fee and waives all exemption under the laws and Constitution of the State of Alabama or any other State as to personal property. Plaintiff alleges the reasonable attorney's fee is \$16.00.

COUNT II

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SEVEN AND 60/100 DOLLARS (\$407.60), due by chattel mortgage note made by him on the 16th day of September 1950, and due and payable on or before the 16th day of September 1951, together with interest thereon.

Said note also provides for a reasonable attorney's fee and waives all exemption under the laws and Constitution of the State of Alabama or any other State as to personal property. Plaintiff alleges the reasonable attorney's fee is \$80.00.

Wm. J. Allen
Attorney for Plaintiff

The Defendant resides at:
Foley, Alabama

FILED

8-26 1954

ALICE L. HINCH, Clerk

Received 26 day Aug - 1954
and on _____ day of _____ 1954

I served a copy of the within _____
on _____

by service on _____

TAYLOR WILKINS, Sheriff

By _____

*not found in
this County*

Returned 15 day of Oct 1954
Not found in any county after diligent search and in-
quiry.

Taylor Wilkins Sheriff
By L. L. Steadman
Deputy Sheriff

RECORDED

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

T. M. MOSS, d/b/a NEW GORDON
MOTOR COMPANY,
Plaintiff

VS:

RALPH MORTON,
Defendant

FILED
AUG 26 1954
ALICE J. DUCK, Clerk

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, - GREETING:

YOU ARE HEREBY COMMANDED to summon RALPH MORTON, 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 RALPH MORTON, by T. M. MOSS d/b/a NEW GORDON MOTOR COMPANY.

Witness my hand this the 26th day of August, 1954.

Archie French
Clerk of Court

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COMPLAINT

T. M. MOSS d/b/a NEW GORDON MOTOR
COMPANY,

Plaintiff.

VS:

RALPH MORTON,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT I

The Plaintiff claims of the Defendant the sum of EIGHTY & 00/100 DOLLARS (\$80.00), due by chattel mortgage note made by him on the 16th day of September 1950, and due and payable on or before the 15th day of September 1953, together with interest thereon.

Said note also provides for a reasonable attorney's fee and waives all exemption under the laws and Constitution of the State of Alabama or any other State as to personal property. Plaintiff alleges the reasonable attorney's fee is \$16.00.

COUNT II

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SEVEN AND 60/100 DOLLARS (\$407.60), due by chattel mortgage note made by him on the 16th day of September 1950, and due and payable on or before the 16th day of September 1951, together with interest thereon.

Said note also provides for a reasonable attorney's fee and waives all exemption under the laws and Constitution of the State of Alabama or any other State as to personal property. Plaintiff alleges the reasonable attorney's fee is \$80.00.

Attorney for Plaintiff

The Defendant resides at:

ARMOUR & COMPANY
BALDWIN COUNTY, ALABAMA
CIRCUIT COURT OF

RALPH MORTON,

Defendant

Plaintiff

T. M. MOSS, d/b/a NEW GORDON

464 W 28

SEP 1 1954
SEP 20 1954
SEP 20 1954