

2396

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. C. McKenzie to appear within 30 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 B. F. Bryant, doing business as Bryant Electric Company.

Witness my hand this 18 day of September, 1954.

*W. J. ...*  
Clerk.

\*\*\*\*\*

B. F. BRYANT, doing business as  
Bryant Electric Company,

Plaintiff

VS.

J. C. MCKENZIE,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COMPLAINT

Plaintiff claims of the Defendant the sum of \$164.00 due by promissory note made by the Defendant on the 12th day of June, 1951 and payable on demand, which note is the property of the Plaintiff and is still due and unpaid, with the interest thereon. The Plaintiff avers that in and by the terms of the said note, the Defendant waived all rights of exemption as to this debt and agreed to pay a reasonable attorney's fee for the collection of same, which attorney's fee the Plaintiff alleges to be \$25.00 and which he herewith claims.

*[Signature]*  
Attorney for Plaintiff

COMPLAINT

B. F. BRYANT, doing business as  
BRYANT ELECTRIC COMPANY,

Plaintiff,

VS.

J. C. MCKENZIE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

*Filed 9-28-54*  
*Dee J. Owen*  
*Clerk*

JAMES R. OWEN  
ATTORNEY-AT-LAW  
BAY MINETTE, ALABAMA

Received 29 day of Sept 1954  
and on 29 day of Sept, 1954  
I served a copy of the within Complaint  
on \_\_\_\_\_

By service on J. C. McKenzie

TAYLOR WILKINS, Sheriff  
By [Signature] D. S.

B. F. BRYANT, doing business as  
BRYANT ELECTRIC COMPANY

PLAINTIFF

VS

J. C. MCKENZIE,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

NO. 2396

Now comes the defendant and demurs to the Plaintiff's complaint and for grounds thereof, says:

1. That said complaint does not state a cause of action.
2. That said complaint does not show that the indebtedness is due.
3. That said complaint does not allege a demand in accordance with the terms and conditions of the note.

Wilters & Brantley

By: W. J. Wilters

Attorneys for Defendant

The defendant demands a trial by jury.

Wilters & Brantley

By: W. J. Wilters

Attorneys for defendant