

2397

JOE SCHNEIDER,

Plaintiff,

-vs-

W.M. PATTON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

MOTION TO STAY

Comes the defendant, W.M. Patton, and shows unto this Honorable Court that on to-wit: December 2, 1954, he filed a petition in the District Court of the United States for the Southern District of the Southern Division of the State of Alabama; that presently there is pending a motion by the Defendant, W.M. Patton, to include this debt in said petition for an extension of time; that in said motion he has listed Joe Schneider, Plaintiff, in this cause, and that said Joe Schneider will receive notice of said proceeding; that his wages both present and future are under the jurisdiction and control of said District Court; and moves this Honorable Court to hold in abeyance and stay all proceedings in this matter.

FILED

10-25-54

ALICE J. DUCK, Clerk

W. M. Patton
Attorney for Defendant

2397

STATE OF ALABAMA
BALDWIN COUNTY

Q
Q
Q

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETINGS:

You are hereby commanded to summon W. M. PATTON to appear and answer, plead, or demur, within thirty (30) days from the service hereof, to a Bill of Complaint filed against him in Circuit Court, at Law, for said County of said State by JOE SCHNEIDER.

Herein fail not. Due return make of this writ as the law directs.

Witness this 1st day of Oct, 1954.

Alice J. Duck
Clerk of Court

JOE SCHNEIDER,
Plaintiff

vs.

W. M. PATTON,
Defendant

Q
Q
Q
Q

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE

The Plaintiff claims of the Defendant the sum of Two Hundred Eighty Seven Dollars and Fifty Cents (\$287.50) for work and labor done by the Plaintiff at the request of W. M. PATTON, individually, and as agent for Dorothy Patton, his wife, on improvements on the following described property, viz:

South one-half of Northwest one-fourth of Southeast one-fourth of Southwest one-fourth and Northeast one-fourth of Southeast one-fourth of Southwest one-fourth, Section 2, Township 6, Range 3 East, 15 acres more or less.

which said indebtedness accrued on, to-wit, the 6th day of March, 1954, and is now due and unpaid.

COUNT TWO

The Plaintiff claims of the Defendant the sum of Two Hundred Eighty Seven Dollars and Fifty Cents (\$287.50) due by the Defendant to the Plaintiff on account stated between Plaintiff and Defendant on the 6th day of March, 1954, which said sum of money together with the interest thereon is still due and unpaid.

FILED

10-1-54

ALICE J. DUCK, Clerk

Ernest M. Bailey
Attorney for Plaintiff

7002397

BILL OF COMPLAINT

JOE SCHNEIDER,
Plaintiff

vs.

W. M. PATTON,
Defendant

Received 6 day of Oct 1934
and on 15 day of Oct 1934
I served a copy of the within

on _____
By service on W. M. Patton

TAYLOR WILKINS, Sheriff
By Edw. J. Steadley, S.

Filed 10-11-34
W. M. Patton

ERNEST M. BAILEY
ATTORNEY AT LAW
FAIRHOPE, ALABAMA