

STATE OF ALABAMA }
BALDWIN COUNTY } IN THE CIRCUIT COURT . . LAW SIDE .

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon Martin Brewton to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of Nitrogen Service, Inc., a corporation.

WITNESS my hand this 29 day of Nov, 1954.

Desiree L. W. W. W.
Clerk

- COMPLAINT -

NITROGEN SERVICE, INC., a
corporation,
-vs- Plaintiff,

MARTIN BREWTON,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

- COUNT I -

The Plaintiff claims of the Defendant Three Hundred Forty-five and 79/100 Dollars (\$345.79) due by Promissory Waive Note made by him on, to-wit, April 22, 1952, and payable on November 1, 1952, with interest from date at the rate of six per cent (6%) per annum.

The Plaintiff avers that in and by the terms of said note the Defendant waived all rights of exemption under the Constitution and Laws of Alabama, and any other State, as to personal property, and of this waiver the Plaintiff now claims the benefit.

The Plaintiff further avers that in and by the terms of said note the Defendant agreed to pay all costs of collecting or sec-

uring, or attempting to collect or secure this note, including a reasonable Attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of Fifty Dollars (\$50.00) as such reasonable Attorney's fee.

- COUNT II -

The Plaintiff claims of the Defendant One Hundred Thirty-one and 88/100 Dollars (\$131.88) due from him for merchandise, goods and chattles sold by the Plaintiff to the Defendant on the dates and in the amounts as shown by verified statement, which is attached hereto and specifically made a part hereof, which sum of money, with the interest thereon, is still unpaid.


Attorney for Plaintiff

In Account With
NITROGEN SERVICE, INC.
Summerdale, Ala.

BOOK 002 PAGE 304

To: Martin Brewton
Robertsdale, Alabama

<u>Date</u>		<u>Charges</u>	<u>Balance</u>
1954			
3-29-54	1680# amm, Tank Rent	\$131.88	\$131.88

STATE OF ALABAMA

BALDWIN COUNTY

Before me, C. G. CHASON, a Notary Public
in and for said County in said State, personally appeared
H. KENNEDY, who is known to me, and who, after
being by me first duly and legally sworn, deposes and says; That
he is SECRETARY of Nitrogen Service, Inc., and as such
officer is familiar with the accounts thereof; that the foregoing
statement of account against Martin Brewton is just, true and
correct, and that there is now due on said account the sum of
One Hundred and Thirty-one and 88/100 Dollars (\$131.88), after
allowing all just credits and set-offs.

Nitrogen Service Co
By, H. Kennedy

Sworn to and subscribed before
me on this the 26th day of
November, 1954.

C. G. Chason
Notary Public, Baldwin County
State of Alabama

FILED

11-29-54

ALICE L. SUCK, Clerk

File
2464

received 29 day of Nov 1954
id to 4 day of Dec 1954

Served a copy of the within Dec 1954

Service on Martin Brewton

TAYLOR WILKINS, Sheriff
by William J. Chason D.S.

SUMMONS AND COMPLAINT

NITROGEN SERVICE, INC., a
corporation,

--VS--
Plaintiff,

MARTIN BREWTON,
Defendant.

((((()))

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE

((((()))

FILED

NOV 29 1954

W. J. Chason
WILLIAM J. CHASON

ATTORNEY AT LAW
FOLEY, ALABAMA

CECIL G. CHASON

ATTORNEY AT LAW

FOLEY, ALABAMA

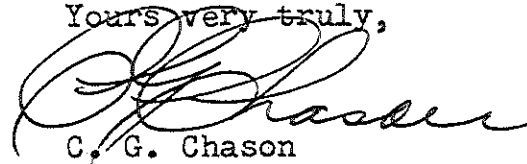
November 26, 1954

Mrs. Alice J. Duck, Clerk
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Summons and Complaint of H. Kennedy
-vs- Martin Brewton and Summons and Complaint of Nitrogen
Service, Inc., -vs- Martin Brewton.

Yours very truly,



C. G. Chason

CGC:fm ✓

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