

2515
ELLIOTT G. RICKARBY
(DECEASED)

LAW OFFICES
RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

15 January 1955

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

Dear Mrs. Duck:

With this we are handing you Summons and Complaint
in the suit of Harold Dinsmore -vs- Maitland Wine-
land. Please process and oblige.

Note that when you are writing up the summons on
this that the defendant's address is Robertsdale,
Alabama. He lives east of Robertsdale and operates
a farm out there.

Yours very truly,


E. G. Rickarby

R/McR
Enc.
2072
2-15

HAROLD H. DINSMORE,
Plaintiff

-vs-

MAITLAND WINELAND,
Defendant.

IN THE CIRCUIT COURT OF
BAIDWIN COUNTY, ALABAMA
AT LAW

COMPLAINT

COUNT ONE: The Plaintiff claims of the Defendant the sum of Fourteen Hundred Dollars (\$1400.00) due by promissory note executed by Defendant on, to-wit, the 13th day of January, 1952; and payable on, to-wit, the 13th day of January, 1953, and Plaintiff avers that insofar as this debt is concerned the Defendant waives all right to have exempted to him any property which is now or may hereafter be exempted to him under the Constitution or laws of the State of Alabama or any other state, and the Plaintiff further claims of the Defendant the sum of One Hundred Twenty-five Dollars (\$125.00) as a reasonable attorneys fee which Defendant agreed to pay by virtue of a clause contained in said note and the Plaintiff claims interest on said money due on said note at the rate of six per cent per annum from the making thereof.

COUNT TWO: The Plaintiff claims of the Defendant the sum of One Hundred Seventy-six and 60/100 Dollars (\$176.60) due from him by account on to-wit, the 9th day of May, 1953, which sum of money with interest thereon is still due and unpaid.

COUNT THREE: The Plaintiff claims of the Defendant the sum of One Hundred Seventy-six and 60/100 Dollars (\$176.60) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit, the 9th day of May, 1953, which sum of money with interest thereon is still unpaid.

RICKARBY & RICKARBY

By: 

E. G. Rickarby, Jr.,
Attorney for Plaintiff

The account sued on is evidenced by an itemized and verified statement of account filed herewith.

RICKARBY & RICKARBY

By: 

E. G. Rickarby, Jr.,
Attorney for Plaintiff.

SUMMONS AND COMPLAINT

Moore Printing 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 Maitland Wineland

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 _____

Maitland Wineland, Defendant.

by Harold H. Dinsmore

Witness my hand this 21 day of January 1955.

Eric J. French, Clerk