

2518

STATE OF ALABAMA )  
BALDWIN COUNTY )  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

003 PAGE 312

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

You are hereby commanded to summon S. T. MOSELEY to appear and answer, plead, or demur, within thirty days from the service of this writ, to a Bill of Complaint filed against him in Circuit Court, at Law, for said County and said State by W. F. POPE, d/b/a Fairhope Grocery and Market.

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

Witness my hand this 25 day of January, 1955.

*Doris J. French*  
Clerk of Court

Defendant lives at  
Fairhope, Alabama

W. F. POPE, d/b/a  
Fairhope Grocery & Market,  
Plaintiff  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

-vs-

S. T. MOSELEY,  
Defendant

AT LAW

COUNT ONE

The Plaintiff claims of the Defendant the sum of Two Hundred Twenty-nine Dollars and Eighty-one Cents (\$229.81) due by promissory note made by him on the 20th day of September, 1954, with interest at 6% per annum and payable on demand, with interest thereon and the Plaintiff avers that in the said note and as a part of the consideration thereof, the Defendant has expressly waived his rights to claim personal property as exempt to him under the Constitution and laws of the State of Alabama and agreed to pay an attorney's fee for the collection thereof and the Plaintiff hereby claims the sum of Thirty Four Dollars and Forty-seven Cents (\$34.47) as such attorney's fee.

*Frederick M. Boileau*  
Attorney for Plaintiff

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Jan 25  
Feb 63

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St. Moseley

Collegiate Standard

BILL OF COMPLAINT

W. F. POPE, d/b/a Fairhope  
Grocery and Market,  
Plaintiff

-vs-

S. T. MOSELEY,  
Defendant

FILED

JAN 25 1955

Alice A. Clark, Clerk

ERNEST M. BAILEY  
ATTORNEY AT LAW  
FAIRHOPE, ALABAMA