

S. W. JACOBS,

Plaintiff,

vs.

JOE ROBBINS,

Defendant.

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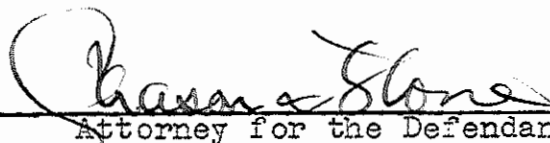
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes now the Defendant in the above cause and for Plea to the Complaint as last amended, filed in said cause says:

1. That the allegations of the Complaint are untrue.
2. That he has paid the debt, for the recovery of which this suit was brought, before the action was commenced.
3. That the note sued upon was executed by the Defendant to the Plaintiff as part of the purchase price for an automobile sold by the Plaintiff to the Defendant and prior to the filing of this suit the Plaintiff repossessed the said automobile and at the time the Plaintiff repossessed such automobile its reasonable market value was in excess of the amount due by the Defendant to the Plaintiff on the note upon which this suit is based.



Attorney for the Defendant

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 Joe Robbins

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 \_\_\_\_\_

Joe Robbins, Defendant\_\_\_\_\_

by S. W. Jacobs

\_\_\_\_\_, Plaintiff\_\_\_\_\_

Witness my hand this 2<sup>nd</sup> day of May 1956

Benjamin J. Smith, Clerk

S. W. JACOBS

PLAINTIFF

VS

JOE ROBBINS

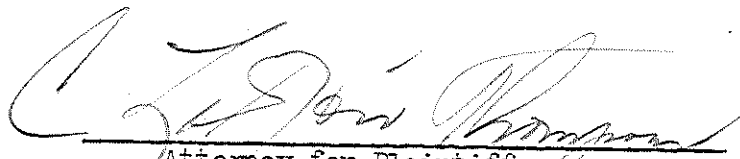
DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

Plaintiff claims of the Defendant, Joe Robbins, One Hundred Twenty-five (\$125.00) Dollars balance due by promissory note made by the Defendant on the 22nd day of May 1954 and payable on the 22nd day of June 1954 with interest thereon.

  
Attorney for Plaintiff.

S. W. JACOBS

Plaintiff

vs.

JOE ROBBINS

Defendant

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

At Law

DEMURRER

Comes the Defendant in the above styled cause and demurs to the ammended complaint filed in said cause on March 16, 1956 and assigns the following separate and several grounds viz :

1. That said compaint does not state a cause of action
2. That said complaint fails to allege the name of the payee in said note.
3. That said complaint fails to allege that said note and the indebtedness evidenced thereby has been duly transferred to him by the payee thereupon.
4. That said complaint fails to allege that the sum sued for is now due and unpaid.
5. For aught that appears from the complaint the Plaintiff is not the holder or owner of said note in due course.

  
Attorney for Defendant

AMENDED COMPLAINT

S. W. JACOBS

PLAINTIFF

VS

JOE ROBBINS

DEFENDANT

IN THE CIRCUIT COURT OF

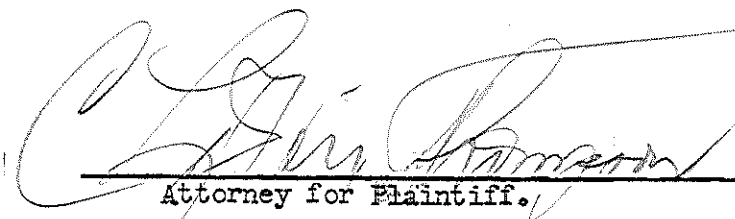
BALDWIN COUNTY, ALABAMA

AT LAW.

CASE NO. 2804

1.

Plaintiff claims of the defendant the sum of One Hundred Twenty-five (\$125.00) Dollars, with the interest thereon as balance due by certain note, executed May 22, 1954, and payable thirty days after date, to the note being for Two Hundred Twenty-five (\$225.00) Dollars signed by Joe Robbins and indorsed by S. W. Jacobs. Plaintiff avers that the defendant was the maker and the Plaintiff was the indorser on said note for the maker thereof, said indorsement being made at the time of the making of the note in order to lend his credit thereto, and that the Plaintiff has paid a balance of One Hundred Twenty-five (\$125.00) Dollars on said Note which the said Defendant failed or refused to pay, and the said Plaintiff is the holder and owner of said note.

  
Attorney for Plaintiff.

S. W. JACOBS,

Plaintiff,

vs.

JOE ROBBINS,

Defendant.

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IN THE CIRCUIT COURT OF


BALDWIN COUNTY, ALABAMA

AT LAW.

DEMURRER

Comes the Defendant in the above styled cause and demurs to the Complaint filed in said cause and each and every count thereof separately and severally and assigns the following separate and several grounds, viz:

1. That said Complaint does not state a cause of action.
2. That Count One of said Complaint fails to allege that the Defendant executed the note sued upon.
3. That Count One of said Complaint fails to allege the due date of the note sued upon.
4. That Count Two fails to allege that the note sued upon provides for payment of an attorney's fee.
5. That Count Two of said Complaint is vague and indefinite.

  
Attorneys for Defendant.

S. W. JACOBS

PLAINTIFF

VS

JOE ROBBINS

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

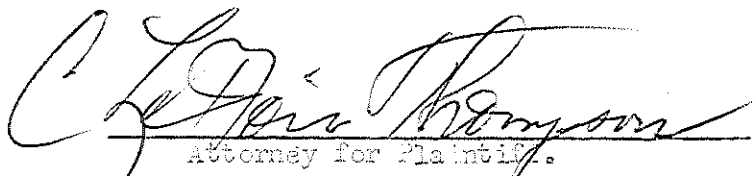
CASE NO. \_\_\_\_\_

1.

The Plaintiff claims of the defendant the sum of One Hundred Twenty-five (\$125.00) Dollars due on a note drawn by the defendant on the 22nd day of May, 1954, payable to the Baldwin County Bank at Bay Minette, Alabama, said note being endorsed by the Plaintiff herein and the said note not being paid at maturity by the said Joe Robbins was charged to the account of Plaintiff, S. W. Jacobs, by the said Baldwin County Bank, whereas said note with interest thereon is still unpaid.

2.

The Plaintiff claims of the defendant a reasonable attorney fee as provided in the said promissory waive note.

  
Attorney for Plaintiff.

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2804

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Joe Robbins

to Ulmer Bradley, Plaintiff, vs.

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 \_\_\_\_\_

Joe Robbins

Defendant .....

by S. W. Jacobs

Plaintiff.....

Witness my hand this 20 day of Dec. 1955

Alice J. Shuck Clerk  
DT



No.

2804

Brookly x  
Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

S. W. Jacobs

Plaintiffs

vs.

Joe Robbins

Defendants

SUMMONS and COMPLAINT

Filed

Dec. 20

19 55

Alice J. Duck

Clerk

C. Leair Thompson

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

12-20, 19 55

Sheriff

I have executed this summons

this

12 Jan

19 56

by leaving a copy with

Joe Robbins

Sheriff claims

86

miles at

Ten Cents per mile Total \$ 8.60

TAYLOR WILKINS, Sheriff

BY

Deputy Sheriff

Taylor Wilkins

Sheriff

J. Horn

Deputy Sheriff

Blackstone