

PEOPLES FERTILIZER COMPANY,  
a Corporation,

Plaintiff,

VS.

AMELIA T. JENKINS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

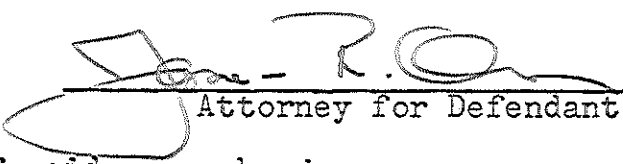
AT LAW

NO. 2829

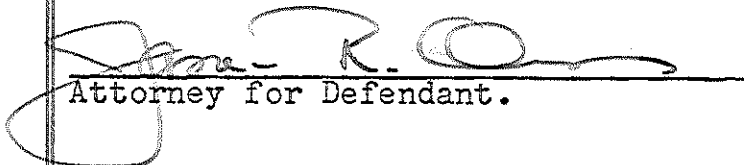
PLEA

Now comes the Defendant and for plea to the Complaint  
heretofore filed in this cause says:

1. The allegations of the Complaint are untrue.

  
Attorney for Defendant

Defendant demands a trial of said cause by jury.

  
Attorney for Defendant.

STATE OF ALABAMA

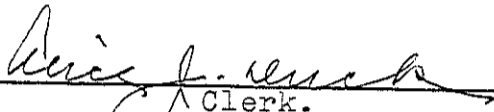
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Amelia T. Jenkins to appear within thirty 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 Peoples Fertilizer Company, a Corporation.

Witness my hand this 18 day of January, 1956.

  
Clerk.

PEOPLES FERTILIZER COMPANY,  
a Corporation,

Plaintiff,

vs.

AMELIA T. JENKINS,

Defendant.


IN THE CIRCUIT COURT OF  
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AT LAW.

COUNT ONE:

The Plaintiff claims of the Defendant Three Thousand Five Hundred Ninety-one Dollars and Eighty-six Cents (\$3,591.86) due by promissory note made by her on to-wit: August 15, 1955, and payable on to-wit: December 1, 1955, together with interest thereon.

The Plaintiff alleges that in, by and as a part of said note, the Defendant waived all rights to exemption under the Constitution and laws of Alabama, or any other State, as to personal property as to such debt and of this waiver the Plaintiff now claims the benefit.

The Plaintiff further alleges that in, by and as a part of said note, the Defendant agreed to pay all costs of collecting or securing or attempting to collect or secure such debt, including a reasonable attorney's fee, whether the same be collected or secured by suit or otherwise, and the Plaintiff further claims of the Defendant the further and additional sum of Six Hundred Dollars (\$600.00) as such reasonable attorney's fee.

  
Attorneys for Plaintiff.