

SUMMONS AND COMPLAINT

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

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

You are hereby commanded to summons GEORGE BARNARD to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of FOLEY TRACTOR COMPANY, INC.

Witness my hand this 28 day of Jan, 19 54.

CLERK

COMPLAINT

FOLEY TRACTOR COMPANY, INC.)
Plaintiff))
vs))
GEORGE BARNARD)
Defendant)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

COUNT I

The plaintiff claims of the defendant TWO HUNDRED FIFTEEN DOLLARS AND SIXTY-SIX CENTS (\$215.66), due by promissory note made by him on the 10th day of November, 1953 and payable on the 10th day of March, 1954, with the interest thereon.

COUNT II

Plaintiff claims of the defendant TWO HUNDRED FIFTEEN DOLLARS AND SIXTY-SIX CENTS (\$215.66), due by promissory note made by him on the 10th day of November, 1953 and payable on the 10th day of March, 1954, with eight per cent interest thereon from November 10, 1953.

Plaintiff avers that in and by the terms of the said note the defendant waived all right to exemption under the Constitution and laws of Alabama as to personal property, and of this waiver plaintiff now claims benefit.

Plaintiff further avers that in and by the terms of said note, the defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure said note, including a reasonable attorney's fee, and the plaintiff further claims of the defendant the further and additional sum of SIXTY DOLLARS (\$60.00), as such reasonable attorney's fee.


ATTORNEY FOR PLAINTIFF

Mr. George Barnard, defendant,
resides near Foley, Alabama