

JAMES BURNS

PLAINTIFF

VS

TOM GRAY

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. 3071

Comes now the Defendant in the above styled cause and for answer to the Plaintiff's complaint says:

1.

The facts alleged therein are untrue.

Wilters & Brantley

BY: Gary J. Wilters, Jr.
Attorneys for the Defendant

The Defendant demands a trial by jury.

Wilters & Brantley

BY: Gary J. Wilters, Jr.
Attorneys for the Defendant

JAMES BURNS

PLAINTIFF

VS

TOM GRAY

DEFENDANT

IN THE CIRCUIT COURT OF

WALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. 3071

Comes now the Defendant in the above styled cause and amends his answer heretofore filed to the Plaintiff's Complaint by adding the following Plea:

2.

There was no consideration for the note sued on.

Walters & Brantley

By Ray J. Wilton
Attorneys for the Defendant

JAMES BURNS,

Plaintiff,

vs.

TOM GRAY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW. NO. 3071.

GENERAL REPLICATION

Now comes the Plaintiff in the above styled cause and for reply to the Defendant's plea 2 says: he joins issue on the said plea.

J. B. Blackburn
Attorney for Plaintiff.

FILED

MAR 9 1957

ALICE L. BUCK, Clerk

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Tom Gray to appear with-
in 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 James Burns.

WITNESS my hand this 26th day of October, 1956.

Alice J. Duck

Alice J. Duck, Clerk of the Circuit
Court of Baldwin County, Alabama.

COMPLAINT

JAMES BURNS,

Plaintiff,

vs.

TOM GRAY,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

Plaintiff claims of the Defendant the sum of One Thousand
Nine Hundred Thirty-two and 30/100 Dollars (\$1,932.30) due on a
promissory waive note made by the Defendant on, to-wit, May 31,
1955, and payable to the Plaintiff on, to-wit, May 31, 1956, which
note is the property of the Plaintiff and, together with the in-
terest thereon, is still due and unpaid.

Plaintiff avers that in and by the terms of the said note
the Defendant waived all rights of personal property exemption as
to this debt and agreed to pay a reasonable attorney's fee for the
collection of same, which attorney's fee the Plaintiff alleges to
be Three Hundred Fifty Dollars (\$350.00), and which he herewith
claims.

J. B. Blackburn
Attorney for Plaintiff.

Received 26 day of Oct 1956
and on 4 day of Nov 1956.
I served a copy of the within S. J. C.
on Tom Gray
By service on _____

TAYLOR WILKINS, Sheriff
By Ellen Stedham D. S.
Robert Dale
Ala

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY Stedham
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

JAMES BURNS,

Plaintiff,

vs.

TOM GRAY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

FILED
OCT 26 1956
ALICE J. DUCK, Clerk

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA