

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mack Fountain 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 John Fountain.

Witness my hand this 21 day of March, 1957.

Reece J. Hensley
Clerk

JOHN FOUNTAIN,

Plaintiff,

vs.

MACK FOUNTAIN,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

COUNT ONE:

The Plaintiff claims of the Defendant One Hundred Eighty-one Dollars and Sixty Cents (\$181.60) due by Promissory Note made by him on the 16th day of December, 1955, and payable on the 31st day of December, 1955, with interest thereon, which sum of money is still unpaid.

The Plaintiff avers 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 attorneys 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 Fifty Dollars (\$50.00) as such reasonable attorney's fee.

The Plaintiff further avers that in, by and as a part of said note the Defendant waived as to this debt or any renewal there-

of, all rights to exemption under the Constitution and Laws of Alabama as to personal property and of this waiver the Plaintiff now claims the benefit.

CHASON & STONE

By: Melburn G. Stone, Jr.

Defendant resides at Lillian,
Alabama

FILED
MAY 21 1934
VICE T. DICK GARY

2108

2108

STATE OF ALABAMA

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BALDWIN COUNTY

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Witness my hand this 21 day of March, 1957.

Reece J. Smith
Clerk

JOHN FOUNTAIN,

¶

Plaintiff,

¶

IN THE CIRCUIT COURT OF

vs.

¶

BALDWIN COUNTY, ALABAMA

MACK FOUNTAIN,

¶

LAW SIDE

Defendant.

¶

COUNT ONE:

The Plaintiff claims of the Defendant One Hundred Eighty-one Dollars and Sixty Cents (\$181.60) due by Promissory Note made by him on the 16th day of December, 1955, and payable on the 31st day of December, 1955, with interest thereon, which sum of money is still unpaid.

The Plaintiff avers 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 attorneys 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 Fifty Dollars (\$50.00) as such reasonable attorney's fee.

The Plaintiff further avers that in, by and as a part of said note the Defendant waived as to this debt or any renewal there-

of, all rights to exemption under the Constitution and Laws of Alabama as to personal property and of this waiver the Plaintiff now claims the benefit.

CHASON & STONE

By: *Marion G. Stone, Jr.*

Defendant resides at Lillian,
Alabama

Filed Mar. 21, 1957
Not found

316
Recorded 31 day of March 1957
and on _____ day of _____ '9____
I served a copy of the within p/c
on Mack Fountain
By service on _____
TAYLOR WILKINS, S. if
By _____ D.S.

Returned 19 day of July 1957
Not found in my county after diligent search and in
quiry.
Taylor Wilkins, Sheriff
By Childress
Deputy Sheriff

Returned 25 day of June 1957
Not found in my county after diligent search and in
quiry.
Taylor Wilkins, Sheriff
By _____
Deputy Sheriff

W. F. Fountain

JOHN FOUNTAIN,
Plaintiff,
vs.
MACK FOUNTAIN,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

SUMMONS AND COMPLAINT

FILED
MAR 21 1957
ALICE J. DUCK, Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA