

MRS. G. W. POPE, d/b/a
FAIRHOPE GROCERY AND MARKET

Plaintiff

-VS-

M. C. POWERS

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

3292

AMENDED BILL OF COMPLAINT

Comes the Plaintiff in the above style cause and amends her bill of complaint to read as follows:

COUNT ONE

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY and 49/100 (\$150.49) DOLLARS, due from the Defendant by account on, to-wit; the 13th day of November, 1953, which sum of money, together with interest thereon, is still unpaid.

COUNT TWO

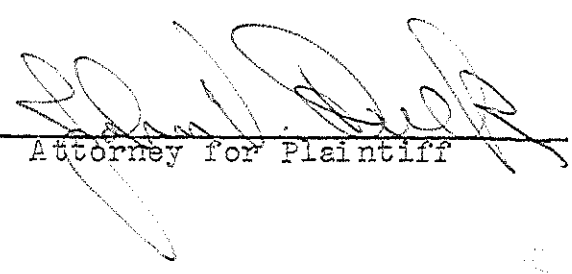
The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY and 49/100 (\$150.49) DOLLARS, due from him on an account stated, between the Plaintiff and the Defendant, on to-wit: the 13th day of November, 1953, which sum of money together with interest thereon, is still unpaid.

COUNT THREE

The Plaintiff claims of the Defendant ONE HUNDRED FIFTY and 49/100 (\$150.49) DOLLARS, due by promissory note made by the Defendant on the 13th day of November, 1953, and payable on the 1st day of February, 1954, 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 attorney's fee whether the same be collected or secured by suit or other wise and the Plaintiff further claims of the Defendant the further and additional sum of, SIXTY FIVE and no/100 (\$65.00) DOLLARS as a 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 thereof, all rights to exemptions under the Constitution and Laws of Alabama as to personal property and of this waiver the Plaintiff now claims the benefit.


Attorney for Plaintiff

MRS. G. W. POPE, d/b/a

FAIRHOPE GROCERY AND MARKET

PLAINTIFF

VS.

M. C. POWERS

DEFENDANT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

B I L L O F C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY and 49/100 DOLLARS (\$150.49, due from him by account on, to-wit: the 13th day of November, 1953, which sum of money, together with interest thereon is still unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY and 49/100 DOLLARS (\$150.49), DUE from him on an account stated, between the Plaintiff and Defendant, on to-wit: the 13th day of November, 1953, which sum of money together with interest thereon, is still unpaid.

COUNT III

The Plaintiff claims of the Defendant ONE HUNDRED FIFTY and 49/100 DOLLARS (\$150.49), due by promissory note made by him on the 13th day of November, 1953, and payable on the 1st day of February, 1954, with the interest thereon.


Attorney for Plaintiff

MRS. G. W. POPE, d/b/a
FAIRHOPE GROCERY AND MARKET

PLAINTIFF

VS.

M. C. POWERS

DEFENDANT

ON ACCOUNT

FROM THE LAW OFFICES OF
JOHN V. DUCK
FAIRHOPE, ALABAMA

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JOHN V. DUCK
FAIRHOPE, ALABAMA

SUMMONS AND COMPLAINT

Moore Ptg. 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 M. C. POWERS

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-----

M. C. POWERS

-----, Defendant.---

by MRS. G. W. POPE, d/b/a FAIRHOPE GROCERY AND MARKET

-----, Plaintiff.---

Witness my hand this 23 day of July 1967

Alvin J. Hucker, Clerk