

STATE OF ALABAMA)
 *
BALDWIN COUNTY)

3522

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Pete Hornady, 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 the same, then and there to answer the complaint of L. D. Owen, doing business as Builders Hardware and Supply Company.

WITNESS my hand this 24 day of July, 1958.

Reverend J. Duck
Clerk.

L. D. OWEN, doing business
as Builders Hardware and
Supply Company,

Plaintiff,

vs.

PETE HORNADY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

COUNT ONE:

The Plaintiff claims of the Defendant the sum of One Hundred Seventy-four and 50/100 Dollars (\$174.50), the balance due under a contract made and entered into by and between the Plaintiff and the Defendant on July 22, 1957, under the terms of which the Defendant was to pay to the Plaintiff the sum of Seventeen and 45/100 Dollars (\$17.45) each month, commencing August 15, 1957, for eighteen consecutive months. Plaintiff avers that the Defendant has made eight payments in the amount of \$17.45 each, the last of which payments was made on March 24, 1958, and that the balance of the said payments are now due and payable.

Plaintiff further avers that under and by the terms of the said contract, the Defendant agreed to pay fifteen percent (15%) of the amount due as attorney's fees in the event the said contract was placed in the hands of an attorney for collection, and Plaintiff

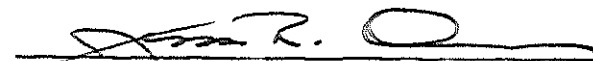
avers that it has become necessary to place the said contract in the hands of an attorney for collection and claims an attorney's fee of Twenty-six and 17/100 Dollars (\$26.17).

COUNT TWO:

The Plaintiff claims of the Defendant the following personal property, to-wit:

One (1) America's Best one-half horsepower
Jet Pump,

with the value of the hire or use thereof during the detention,
to-wit, from the 24th day of April, 1958.


Attorney for the Plaintiff.

770.362-2

SUMMONS AND COMPLAINT

L. D. OWEN, doing business as
Builders Hardware and Supply
Company,

Plaintiff,

vs.

PETE HORNADY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

*Defendant lives at
White House on Cross Road*

FILED
JUL 24 1958
JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

Received 24 day of July 1958
and on 25 day of July 1958
I served a copy of the within on Pete Hornady
By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Tolbert D. S.
White House fork

Sheriff claims 20 miles at
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY Tolbert
DEPUTY SHERIFF