

3650

GEORGE T. FOWLER)
Plaintiff)
-VS-)
JOSEPH LE BLANC)
Defendant)

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

BILL OF COMPLAINT

COUNT ONE:

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED AND SEVENTY FIVE (\$575.00)DOLLARS, due by Promissory Note made by the Defendant on the 20th day of November, 1957, and payable on the 18th day of June, 1958, with interest thereon.

The Plaintiff avers that in, by, and as a part of said note, the Defendant agreed to pay all cost 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 otherwise and the Plaintiff further claims of the Defendant the further and additional sum of ONE HUNDRED TWENTY FIVE (\$125.00)DOLLARS, as a reasonable Attorney's fee.

COUNT TWO:

Plaintiff claims of the Defendant the sum of FIVE HUNDRED (\$500.00)DOLLARS due from him by check drawn on the First National Bank of Bay Minette, Alabama, on the 19th day of February, 1957, and signed by the Defendant, which check was duly presented to the bank upon which same was drawn, and was returned unhonored by that bank on account of insufficient funds; and that said check was given as part payment of the Promissory Note sued on in Count One, which sum of money, together with interest thereon, is still unpaid.

COUNT THREE

Plaintiff claims of the Defendant the sum of TWENTY FIVE (\$25.00)DOLLARS, due from him by check drawn on the American National Bank and Trust Co. of Mobile, Alabama, and signed by the Defendant, which check was duly presented to the bank upon which same was drawn, and was returned unhonored by that bank on account of insufficient funds; and that said check was given as part payment of the Promissory Note sued on in Count One, which sum of money, together with interest thereon is still unpaid.


Attorney For Plaintiff

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 JOSEPH LE BLANC

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-----

JOSEPH LE BLANC

-----, Defendant-----

by GEORGE T. FOWLER

-----, Plaintiff-----

Witness my hand this

12

day of

Sept

1958

Deirdre H. H. H. H., Clerk