

3680

GEORGE J. DOODY,
Plaintiff,

-VS-

SAM SANDERS,
Defendant,

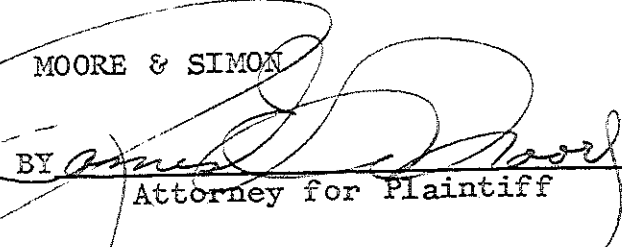
) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA.
)
) AT LAW.
)
)
) NO.

COUNT ONE

The Plaintiff claims of the Defendant the sum of One Hundred forty (\$140.00) Dollars due from him on account for rent, from October 15, 1958, which sum of money with the interest thereon is still due and unpaid.

A verified itemized statement of said account is attached hereto and made a part hereof.

Plaintiff claims a lien on the farm machinery and equipment to secure the payment of said rent, and has filed herewith Affidavit and Bond praying attachment to secure said lien.

MOORE & SIMON
BY 
Attorney for Plaintiff

Defendant's Address:

The Old Wilson Place on River Road
at Tensaw

MOORE & SIMON
ATTORNEYS AT LAW
1011-13 VAN ANTWERP BUILDING
MOBILE 12, ALABAMA
HEMLOCK 3-9526

JAMES E. MOORE
OTTO E. SIMON
LIONEL L. LAYDEN

October 2, 1958

Mrs. Alice Duck
Clerk, Circuit Court
County Courthouse
Bay Minette, Alabama

Re: New case
Doody vs. Sanders

Dear Mrs. Duck:

I am filing herewith a new case for collection on a rent account on behalf of Dr. George Doody of Mobile. Please note that we are asking for an Attachment to secure payment of this account, in view of the tenant's pending vacation of the premises in the immediate future.

Of course, under these circumstances, I will appreciate your issuing the Attachment Writ to the Sheriff as soon as possible so that we will not lose out by the tenant vacating and selling the farm machinery. I have attached a slip to the Attachment Bond and Affidavit requesting the Sheriff to levy on a Ford tractor, property of the Defendant, located on the farm premises.

Thanking you for your usual fine assistance and cooperation, I am

Very truly yours,

MOORE & SIMON


James E. Moore

JEM:sw

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 Sam Sanders

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-----

-----Sam Sanders-----, Defendant---

by George J. Doody-----

-----, Plaintiff---

Witness my hand this-----18th-----day of-----October-----1958.

George J. Doody, Clerk