

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon P. E. BREWER, also known as PERCY BREWER, and LILLIAN BREWER, 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, Alabama, at the place of holding same by E. F. SANDERS, Foley, Alabama.

Witness my hand this the 19 day of January, 1959.

David L. Busch
Clerk

CC

COMPLAINT

E. F. SANDERS)

PLAINTIFF

VS:

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

P. B. BREWER, also known as)
PERCY BREWER and ELLIAN)
BREWER)

AT LAW

DEFENDANTS)

COUNT I:

The plaintiff claims of the defendants ONE THOUSAND TWO HUNDRED & 00/100 DOLLARS (\$1200.00), due by promissory note made by them on the 14th day of October, 1957, and payable on the 14th day of November, 1957, with interest thereon.

Said note provides for a reasonable attorney's fee which plaintiff alleges to be \$200.00.

COUNT II:

The plaintiff claims of the defendants ONE THOUSAND & 00/100 DOLLARS (\$1000.00) due by promissory note made by them on the 28th day of April, 1958 and payable on demand, with interest thereon.

Said note provides for a reasonable attorney's fee which plaintiff alleges to be \$200.00.

enable attorney's fee which plaintiff

Mark C. Miller
Attorney for Plaintiff

Filed 1-19-59
Ex. 1-20-50.
on. P. B. Brewer

SUMMONS AND COMPLAINT

E. F. SANDERS

VS:

P. B. BREWER, also known as
PERCY BREWER and LILLIAN
BREWER

Received 19 day of Jan 1959
and on 20 day of Jan 1959
I served a copy of the within DEC
on P. B. Brewer
Lillian Brewer
By service on P. B. Brewer
Lillian Brewer not found in
this county TAYLOR WILKINS, Sheriff
By W. A. Talbert D. S.

no miles

FILED

JAN 19 1959

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

1881

September 15, 1953

Judge Hall:

Re

3745

E. F. Sanders
v.

P. B. Brewer et al

Mr. Thompson has agreed to
with draw ~~draw~~ jury
demand and has agreed to
permit me to enter judgment
in amount of \$13/18 ^{per}
~~14/15~~

You may strike P. B. Brewer from
this is seventy four ^{complaint}
Based on a promissory note
waive note ^{HC.}
J. L. Clark

A. L. - Sent Direct - C. L. Dan Thompson

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

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Witness my hand this the 19 day of January, 1959.

E. F. Sanders

CC

COMPLAINT

E. F. SANDERS)

PLAINTIFF)

VS:)

P. B. BREWER, also known as)
PERCY BREWER and LILLIAN)
BREWER)

DEFENDANTS)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

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Said note provides for a reasonable attorney's fee which plaintiff alleges to be \$200.00.

W. H. Allen

Attorney for Plaintiff

E. F. SANDERS

PLAINTIFF

VS

P. B. BREWER, also known as
PERCY BREWER and LILLIAN
BREWER,

DEFENDANTS

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

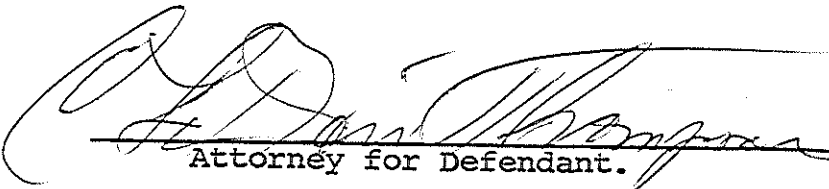
Comes the Defendant in the above styled cause and for answer
to said complaint and to each count thereof separately and
severally shows unto this Honorable Court as follows:

COUNT I.

As to count one he denies the allegations alleged therein.

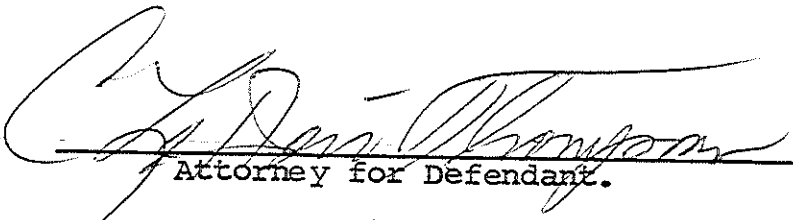
COUNT II.

As to count two he denies the allegations alleged therein.


Attorney for Defendant.

Defendant demands a trial by jury.

Filed
Mar. 9, 1959


Attorney for Defendant.

June

3745

E. F. SANDERS

PLAINTIFF

VS

P. B. BREWER, also known as
PERCY BREWER and LILLIAN
BREWER

DEFENDANTS

FILED

MAR 9 1959

ALICE L. DUCK, CLERK
REGISTER

Declaratory Judgment & Injunction

FOR DEPOSIT

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon P. B. BREWER, also known as PERCY BREWER, and LILLIAN BREWER 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, Alabama, at the place of holding same by the FARMERS & MERCHANTS BANK, Foley, Alabama, an Alabama Corporation.

Witness my hand this the 19 day of January, 1959.

Alice J. Hinch
Clerk

EX-120-29

CC

COMPLAINT

FARMERS & MERCHANTS BANK,)
Foley, Alabama, An Alabama)
Corporation)

PLAINTIFF)

VS:)

P. B. BREWER, also known as)
PERCY BREWER and LILLIAN)
BREWER)

DEFENDANTS)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendants SEVEN HUNDRED & 00/100 DOLLARS (\$700.00), due by promissory note made by them on the 13th day of January, 1958, and payable on the 10th day of April, 1958, with interest thereon.

Said note provides for a reasonable attorney's fee which plaintiff alleges to be \$140.00.

COUNT II:

The plaintiff claims of the defendants EIGHT HUNDRED & 00/100 DOLLARS (\$800.00), due by promissory note made by them on the 24th day of February, 1958, and payable on the 24th day of May, 1958, with interest thereon.

Said note provides for a reasonable attorney's fee which plaintiff alleges to be \$160.00.

Julius C. Clark
Attorney for Plaintiff

3746

SUMMONS & COMPLAINT

Received 20 day of Jan 1937
at 20 day of Jan 1937
served a copy of the within 292

Service on P. B. Brewer
Lillian Brewer not found in
this county FLORENCE WILKINS, Sheriff
By W. A. Talbert D. S.
omi

FARMERS & MERCHANTS BANK,
Foley, Alabama, An Alabama
Corporation

VS:

P. B. BREWER, also known as
PERCY BREWER and LILLIAN
BREWER

FILED
JAN 19 1937
JAN 19 1937

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

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Witness my hand this the 19 day of January, 1959.

Reese J. Smith
Clerk

CC

COMPLAINT

FARMERS & MERCHANTS BANK,)
Foley, Alabama, An Alabama)
Corporation)

PLAINTIFF)

VS:)

P. B. BREWER, also known as)
PERCY BREWER and LILLIAN)
BREWER)

DEFENDANTS)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

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Said note provides for a reasonable attorney's fee which plaintiff alleges to be \$160.00.

Wm. C. Smith
Attorney for Plaintiff

DEFENDANTS

CASE NO. _____

As to count two he denies the allegations thereof.

Filed
Mar. 9, 1959

Attorney for Defendant

3746

FARMERS & MERCHANTS BANK,
Foley, Alabama, An Alabama
Corporation

PLAINTIFF

VS

P. B. BREWER, also known as
PERCY BREWER and LILLIAN
BREWER,

DEFENDANTS

FILED

MAR 9 1959

ALICE J. DUCK, CLERK
REGISTER

September 15, 1959

Judge Hall Re' #3746

Foreman - Merchant Bank

PB Brewer

Mr. Thompson has agreed to
with draw demand for jury
trial and permit me to enter
judgment in amount of

#1938⁰⁰

This is Based on ⁰⁰ you may strike
a promissory ⁰⁰ billion Brewer from
Complaint
Waive ⁰⁰ Sincerely yours J.C.

Walter Clu/M

OK - Gil Dicit

C. J. Thompson