

SUMMONS AND COMPLAINT

3795

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 J. B. Joiner

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 _____

_____ J. B. Joiner _____, Defendant _____

by _____ W. R. Stuart _____

_____, Plaintiff _____

Witness my hand this 18 day of March 1959

Alice J. Huck _____, Clerk

Exp. April 13, 1959

No. _____ Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed _____ 19__

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19__

_____, Sheriff

I have executed this summons

this _____ 19__

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

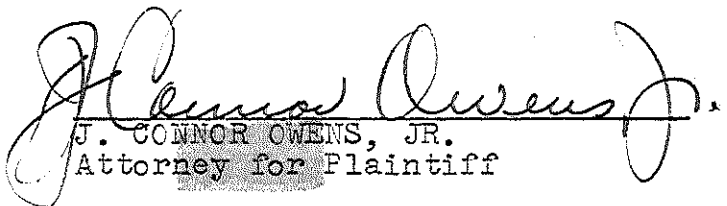
W.R. STUART,
Plaintiff,
vs.
J.B. JOINER,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW

Plaintiff claims of the defendant the sum of \$150.00, the balance due on a promissory waive note made by the defendant on the 29th day of March, 1958, and due and payable on the 1st day of August, 1958, with interest thereon.

Plaintiff further alleges that in and by the terms of said note, the defendant waived all rights of homestead and exemption under the laws of the State of Alabama, and plaintiff claims the benefit of said waiver.

Plaintiff further alleges that in and by the terms of said note, the defendant agreed to pay all costs of collection, including a reasonable attorney's fee, and plaintiff claims the additional sum of \$25.00 as an attorney's fee in the premises.


J. CONNOR OWENS, JR.
Attorney for Plaintiff

Received 18 day of Mar 1959
and on 13 day of April 1959
sent a copy of the within to
on J.B. Joiner
By service on J.B. Joiner
TAYLOR WILKINS, Sheriff
By W.A. Talbert D.S.
o me

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 3795

W.R. STUART,
Plaintiff,
vs.
J.B. JOINER,
Defendant.

SUMMONS AND COMPLAINT

FILED
MAR 18 1959
ALICE J. DUCK, Clerk

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
101 Court House Square
BAY MINETTE, ALABAMA