

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John P. Bertolla 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 same, then and there to answer the complaint of J. M. Campbell and Bonnie Mae Campbell.

Witness my hand this 23 day of April, 1959.

Alice L. ...
Clerk.

Exh 5-12-59

J. M. CAMPBELL and BONNIE MAE CAMPBELL,
Plaintiffs,
vs.
JOHN P. BERTOLLA,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

3819

COUNT ONE:

The Plaintiffs claim of the Defendant Two Hundred Dollars (\$200.00) due from the Defendant to the Plaintiffs by reason of the failure of the Defendant, within thirty (30) days after having been requested in writing on the 3rd day of March, 1959, by the Plaintiff J. M. Campbell to the said Defendant, to enter on the margin of the record of the mortgage hereinafter referred to the satisfaction of that certain mortgage from the Plaintiffs to the Defendant dated January 29, 1945 and recorded in the Office of the Judge of Probate of Baldwin County, Alabama in Mortgage Record 102 at pages 441 et seq. And the Plaintiffs further allege that on the date of said written request and the receipt thereof by the Defendant that said mortgage, and the notes and debt secured thereby were fully and completely paid and had been

paid by the Plaintiffs on, to-wit: June 26, 1945. Wherefore Plaintiffs bring this suit and ask judgment in the above amount.

CHASON & STONE

By:  
Attorneys for Plaintiffs

3819

J. M. CAMPBELL and BONNIE MAE CAMPBELL,

Plaintiffs,

vs.

JOHN P. BERTOLLA,

Defendant.

Received 24 day of April 1959
and on 12 day of May 1959
I served a copy of the within R & C
on John P. Bertolla

By service on _____

TAYLOR WILKINS, Sheriff
By Edleigh Steadham, S.
Sheriff claims 40 miles at 4.00
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
BY Steadham
DEPUTY SHERIFF

SUMMONS AND BILL OF COMPLAINT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

FILED

APR 23 1959

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

Loyley, ala