

38 32

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John H. King 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 the same, then and there to answer the complaint of M. L. Lambeth.

Witness my hand this the 2 day of May, 1959.

W. J. Slack
Clerk

M. L. LAMBETH,

Plaintiff,

VS.

JOHN H. KING,

Defendant.

X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

The Plaintiff claims of the Defendant One Thousand Sixty-six Dollars (\$1,066.00) due by promissory note made by him on the 24th day of January, 1959, with interest thereon.

The Plaintiff further alleges that in and by the terms of said note the Defendant agreed to pay all costs of collecting, or securing, or attempting to collect or secure this note, 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 sum of Two Hundred and Fifteen Dollars (\$215.00) as such reasonable attorney's fee as provided in said note.

The Plaintiff further alleges that in and by the terms of said note that the Defendant waived as to this debt, or any renewal thereof, all right to exemption under the Constitution and laws of

Alabama or any other state, as to personal property and the Plaintiff does hereby claim the benefit of such waiver.

CHASON & STONE

By:

Robert S. Stone
Attorneys for Plaintiff

Defendant's address: Fairhope, Alabama

FILED
MAY 8 1927
VICTOR DICKSON
CLERK

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John H. King 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 the same, then and there to answer the complaint of M. L. Lambeth.

Witness my hand this the 7 day of May, 1959.

W. J. Duck
Clerk

M. L. LAMBETH,

Plaintiff,

vs.

JOHN H. KING,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

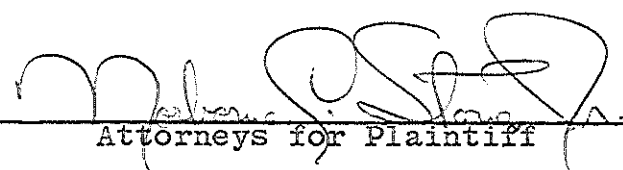
The Plaintiff claims of the Defendant One Thousand Sixty-six Dollars (\$1,066.00) due by promissory note made by him on the 24th day of January, 1959, with interest thereon.

The Plaintiff further alleges that in and by the terms of said note the Defendant agreed to pay all costs of collecting, or securing, or attempting to collect or secure this note, 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 sum of Two Hundred and Fifteen Dollars (\$215.00) as such reasonable attorney's fee as provided in said note.

The Plaintiff further alleges that in and by the terms of said note that the Defendant waived as to this debt, or any renewal thereof, all right to exemption under the Constitution and laws of

Alabama or any other state, as to personal property and the Plaintiff does hereby claim the benefit of such waiver.

CHASON & STONE

By: 
Attorneys for Plaintiff

Defendant's address: Fairhope, Alabama

Sherriff 3832
M. L. LAMBETH,

Plaintiff,

vs.

JOHN H. KING,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND BILL OF COMPLAINT

9123-4 and 5

1729-37 and No

FILED

MAY 7 1959

ALICE J. DUCK, CLERK
REGISTER

Eng 1229 37th and No.

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

ad

Received 28 day of July 1959

and on day of 19

I served a copy of the within 900

on John H. King

By service on

TAYLOR WILKINS, Sheriff

By D. S.

Returned 15 day of August 1959

Not found in my county after diligent search and inquiry. John H. King

Taylor Wilkins, Sheriff

By Deputy Sheriff

Returned for address this file

day of SEP 1 1959

HOLI A. McDOWELL, Sheriff
Jefferson County, Alabama

By G. F. Ruddy D.S.

Unable to locate in Colbert
County, Ala., This day of

April 18 1960

 Sheriff

 D.S.