

HERBERT AARON,

Plaintiff,

Versus

LLOYD McCrARY,

Defendant.

) IN THE COUNTY COURT OF

) BALDWIN COUNTY,

) ALABAMA,

) NO. 3863

Plaintiff claims of the Defendant the sum of Two Hundred and NO/100 Dollars (\$200.00) for that on to-wit the 11th day of February, the Defendant agreed to sell to the Plaintiff a parcel of property and did receive from the Plaintiff the sum of Two Hundred and NO/100 Dollars (\$200.00) as earnest money, said sale to be dependant upon the Defendant being able to deliver a good and merchantable title to the property Defendant was selling to the Plaintiff and in the event the title be not good and merchantable that the Defendant would return the Two Hundred and NO/100 Dollars (\$200.00) to the Plaintiff, and Plaintiff further alleges that the Defendant notified him that the title was not clear and that he would return the said Two Hundred and NO/100 Dollars (\$200.00) which the defendant has failed to do and Plaintiff further alleges that the said Two Hundred and NO/100 Dollars (\$200.00), with the interest thereon from to-wit the 11th day of February, 1959, is still due and unpaid.

FILED

6-11 59

**ALICE J. DUCK, CLERK
REGISTER**

Sydney S. Pfeiffer
Sydney S. Pfeiffer, Attorney for Plaintiff
305 Staples-Pake Building
Mobile, Alabama

Defendant's Address:

Daphne, Alabama

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 Lloyd McCreary

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.....

..... Lloyd McCreary, Defendant....

by Herbert Aaron

....., Plaintiff....

Witness my hand this 11 day of June 19 59

Benjamin A. Henshaw Clerk

Exp 6-24-59

No. 3863 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

HERBERT AARON

Plaintiffs

vs.

LLOYD McCREARY

Defendants

Summons and Complaint

Filed 6-11-59 19__

Alice J. Duo k

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Received In Office

6/12 1959

_____, Sheriff

I have executed this summons

this 6-24 1959

by leaving a copy with

Lloyd McCreary

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

BY [Signature]
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Eddie Steadman Deputy Sheriff

Daphne, Ala.

PFLEGER & HILLARD

ATTORNEYS AT LAW

305 STAPLES-PAKE BUILDING

MOBILE, ALABAMA

ASSOCIATES:
SYDNEY S. PFLEGER
GROVES C. HILLARD

June 8, 1959

PHONE:
HE 8-4748

Honorable Ramsey Stuart
Judge of County Court
Baldwin County
Bay Minette, Alabama

Dear Judge Stuart:

I would like to file the enclosed suit against Lloyd McCrary, who lives at Daphne. I would appreciate your advising me as to when the matter will be set for a hearing in order that I may have my client notified and be present for the hearing.

With kindest personal regards, I remain

Very truly yours,


Sydney S. Pfleger

SSP/mmhf

Enclosures: 2

*Mrs. Duck file
& write Mr. Pfleger*