

SUMMONS

STATE OF ALABAMA)
COUNTY OF BALDWIN)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA _____ GREETING:

You are hereby commanded to summons Frank Soesbe Jr. to appear before the Circuit Court, to be held at the place of holding same for said County, within thirty (30) days from service of this process, then and there to answer the complaint of Magnolia Land Company, a corporation.

Witness my hand this 29 day of June, 1959.

Ex-7-21-59

Albert D. Smith
CLERK

* * * * *

COMPLAINT

MAGNOLIA LAND COMPANY,)
A CORPORATION,)
PLAINTIFF)
VS)
FRANK SOESBE JR.,)
DEFENDENT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

3885

I

The Plaintiff claims of the Defendant the sum of Four Hundred Eighty One Dollars (\$481.00), due by promissory note made by the Defendant on the 15th day of February, 1958, and payable on the 15th day of October, 1958, with interest from the 1st day of January, 1957, at the rate of six (6%) per cent per annum.

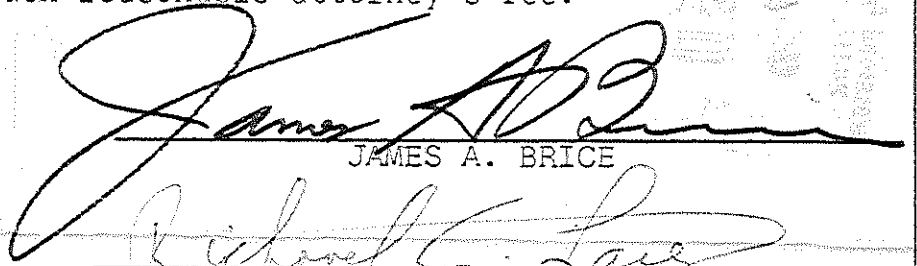
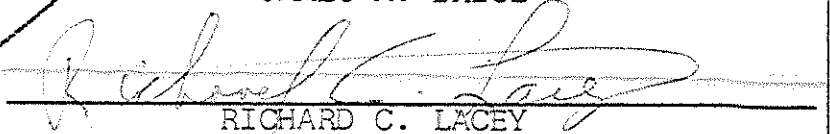
II

The Plaintiff claims of the Defendant the sum of Four Humdred Eighty One Dollars (\$481.00), due by promissory note made by the

Defendant on the 15th day of February, 1958, and payable on the 15th day of October, 1958, with interest from the 1st day of January, 1957.

Plaintiff avers that in and by the terms of said note the Defendant waived all right to exemption under the constitution and laws of the State of Alabama, and of this waiver Plaintiff now claims benefit.

Plaintiff further avers 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 said note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of One Hundred Ninety Two Dollars, as such reasonable attorney's fee.


JAMES A. BRICE

RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

The Defendant Frank Soesbe Jr. resides at Foley, Alabama.

FILED
JUN 29 1958
ALICE L. DUCK, CLERK
REGISTER

3885

Magnolia Land Co
Frank Suesbe, Jr

Received 29 day of June 1959
and on 27 day of July 1959
I served a copy of the within
on Frank Suesbe, Jr
By service on TAYLOR WILKINS, Sheriff
BY DEPUTY SHERIFF

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY DEPUTY SHERIFF

FILED
JUL 29 1959
ALICE J. DUCK, CLERK
REGISTER

WITNESSES FOR PLAINTIFF

The Defendant Frank Suesbe, Jr. receives et Toloy, witnesses.

FILED

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Witness my hand this _____ day of _____, 19____.

CLERK

* * * * *

COMPLAINT

MAGNOLIA LAND COMPANY,)
A CORPORATION,)
PLAINTIFF)
VS)
FRANK SOESBE JR.,)
DEFENDENT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

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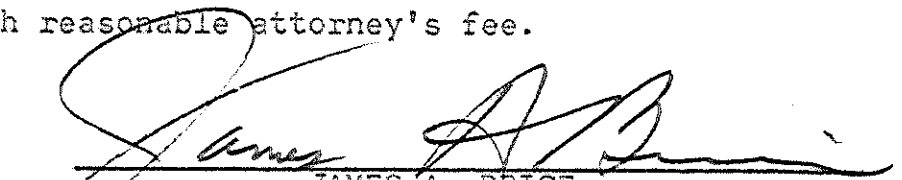
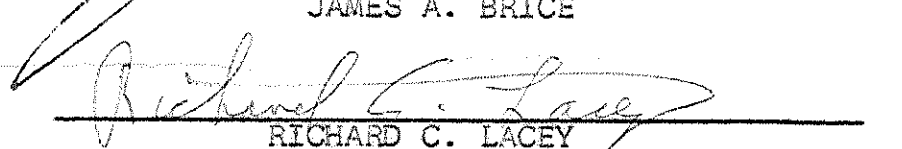
II

The Plaintiff claims of the Defendant the sum of Four Hundred Eighty One Dollars (\$481.00), due by promissory note made by the

Defendant on the 15th day of February, 1958, and payable on the 15th day of October, 1958, with interest from the 1st day of January, 1957. ~~not applicable.~~

Plaintiff avers that in and by the terms of said note the Defendant waived all right to exemption under the constitution and laws of the State of Alabama, and of this waiver Plaintiff now claims benefit.

Plaintiff further avers 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 said note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of One Hundred Ninety Two Dollars, as such reasonable attorney's fee.


JAMES A. BRICE

RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

The Defendant Frank Soesbe Jr. resides at Foley, Alabama.

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Witness my hand this _____ day of _____, 19____.

CLERK

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COMPLAINT

MAGNOLIA LAND COMPANY,
A CORPORATION,
PLAINTIFF

VS

FRANK SOESBE JR.,
DEFENDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

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LAW OFFICES
JAMES A. BRICE
FOLEY, ALABAMA

JAMES A. BRICE
RICHARD C. LACEY

P. O. Box 298
WHITEHALL 3-3601

August 26, 1959

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re: Magnolia Land Company vs.
Frank Soesbe, Jr.

Dear Mrs. Duck:

Unless I am in error, plaintiff is entitled to judgment by default.

Please place the file before Judge Hall for judgment for \$653.00, being \$481.00 principal, \$77.00 interest, and \$95.00 Attorney's fee.

Note is enclosed. Please send certified copy of judgment.

Very truly yours,


James A. Brice

JAB/vd

Enclosures

cc:Mr. J. B. Foley
Foley, Alabama