

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon David McBride 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 A. A. Corte & Sons, a partnership.

Witness my hand this 16 day of July, 1959.

Clerk

VS.

DAVID McBRIDE,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendant Six Hundred Dollars (\$600.00) due by Promissory Note made by him on the 27th day of June, 1957, and payable on demand, with interest thereon. And the Plaintiff alleges that it has made demand on the Defendant for the payment of said note but that he has failed and refused to pay the same, hence this suit.

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, the payment of the amounts due thereunder, including a reasonable attorney's fee and the Plaintiff claims of the Defendant the further and additional sum of One Hundred Twenty Dollars (\$120.00) as such reasonable attorney's fee.

The Plaintiff further alleges that the Defendant in and by the terms of said note waived all right to exemption under the Con-

stitution and laws of the State of Alabama as to personal property as to the debt evidenced thereby and the Plaintiff does hereby claim the benefit of such waiver.


COUNT TWO:

The Plaintiff claims of the Defendant the further and additional sum of Seven Hundred and Twenty-one Dollars and One Cent (\$721.01) due from him by account on the 5th day of July 1958, which sum of money with the interest thereon, is still unpaid.

CHASON & STONE

FILED
JUL 16 1959
ALICE J. DUCK, Clerk

By:


Attorneys for Plaintiff

Received 16 day of July 1959
and on 28 day of July 1959
served a copy of the within cc
on David McBride
By service on _____

TAYLOR WILKINS, Sheriff
By Portia Chiles P.S.

Lotey

Sheriff claims 22 miles @
Ten Cents per mile Total \$ 2.20
TAYLOR WILKINS, Sheriff
BY cc
DEPUTY SHERIFF

3904

A. A. CORTE & SONS,
Plaintiff,

vs.

DAVID McBRIDE,
Lotey Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

FILED
JUL 16 1959

ALICE J. WICK, Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA