

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----GREETINGS:

You are hereby commanded to summons A. B. Lee to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of George Styron.

WITNESS my hand this 14 day of August, 1959.

CLERK

COMPLAINT

GEORGE STYRON,) IN THE CIRCUIT COURT OF
PLAINTIFF,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW.
A. B. LEE,)
DEFENDANT.)

3934

I.

The plaintiff claims of the defendant the sum of Two Thousand and No/100 Dollars (\$2,000.00) principal, due by mortgage note made by said defendant on the 12th day of August, 1957, and payable on the 12th day of February, 1958, with interest from the 12th day of August, 1957, at the rate of eight (8%) per cent per annum.

II.

The plaintiff claims of the defendant the sum of Two Thousand and No/100 Dollars (\$2,000.00) principal, due by mortgage note made by said defendant on the 12th day of August, 1957, and payable on the 12th day of February, 1958, with interest from the 12th day of August, 1957, at the rate of eight (8%) per cent per annum.

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 attorneys fee, and plaintiff further claims of the defendant the ruther and additional sum of One Hundred Fifty and No/100 Dollars (\$150.00) as such reasonable attorney's fee.

FILED

AUG 14 1959

ALICE J. DUCK, CLERK
REGISTER

ATTORNEYS FOR PLAINTIFF

JAMES A. BRICE

RICHARD C. LACEY

Received 13 day of Aug 1959
and on _____ day of _____ 19____
served a copy of the within _____
on A. S. Jones
By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

12- Oct 59

Returned 14 day of Sept. 1958
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff

By Childress
Deputy Sheriff

no. 3934

George Styron

vs.

A. B. Lee

Not Found

FILED

AUG 14-59

ALICE L. DUCK, CLERK
REGISTER

LAW OFFICES OF
JAMES A. BRICE
RICHARD C. LACEY
FOLEY, ALABAMA

LAW OFFICES
JAMES A. BRICE
FOLEY, ALABAMA

JAMES A. BRICE
RICHARD C. LACEY

P. O. Box 298
WHITEHALL 3-3601

November 11, 1959

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

Re: George Styron
vs: A. B. Lee
Law 3934

Dear Mrs. Duck:

We have previously received your two notations which indicated the Sheriff has not been able to locate the Defendant for service of process.

Mr. Lee is working in Linden, Alabama, as reported to you. He returns to Foley about once a month, arriving on Saturday. We would, therefore, greatly appreciate your sending the papers back to Deputy Childress asking him to hold them until Mr. Lee's next appearance in Foley at which time we will call Mr. Childress so that he will have no problem in serving him.

Thank you.

Very truly yours,


James A. Brice

JAB/vd

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PLAINTIFF,

VS.

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