

S U M M O N S

STATE OF ALABAMA)
BALDWIN COUNTY)

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 Charlie Hadley 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 South Baldwin County Hospital Corporation.

Witness my hand this 28 day of Dec, 1959.

Circuit Clerk

Ex: 9-14-59

C O M P L A I N T

SOUTH BALDWIN COUNTY HOSPITAL
CORPORATION.

IN THE CIRCUIT COURT OF

Plaintiff.

BALDWIN COUNTY, ALABAMA

VS.

AT LAW.

CHARLIE HADLEY.

Defendant.

11

The Plaintiff claims of the Defendant the sum of One Hundred and 60/100 (\$100.60) Dollars, principal, due by promissory note made by the Defendant on the 18th day of March, 1959, and payable on the 4th day of April, 1959, with interest from the 4th day of April, 1959, at the rate of six (6%) per cent per annum.

The Plaintiff claims of the Defendant the sum of One Hundred and 60/100 (\$100.60) Dollars, principal, due by promissory note made by the Defendant on the 18th day of March, 1959, and payable on the 4th day of April, 1959, with interest from the 4th day of April, 1959, at the rate of six (6%) 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 attorney's fee, and Plaintiff further claims of the Defendant the further and additional sum of Thirty Five and No/100 (\$35.00) Dollars as such reasonable attorney's fee.

FILED

AUG 28 1958

ALICE I. DUCK, CLERK
REGISTER

James A. Bruce (L.S.)
JAMES A. BRUCE

Richard C. Lacey (L.S.)
RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

The Defendant resides at Robertsdale, Alabama.

Received 28 day of Aug 1959
and on 4 day of Sept 1959
I served a copy of the within 89C
on Charles Hadley

By service on _____
TAYLOR WILKINS, Sheriff
By Edleigh Steadham D. S.

Rebertsdale, Ala

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY Steadham
DEPUTY SHERIFF

703960

South Baldwin
County Hospital Cor.

VS.

Charles Hadley

FILED

AUG 28 1959

ALICE J. DUCK, CLERK
REGISTER

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