

H. KENNEDY,

Plaintiff,

vs.

WILLIAM M. CAMPBELL,

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

DEMURRER

3964

Comes the Defendant in the above styled cause and demurs to the complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That the allegations of said complaint are vague and indefinite.
3. That said count does not allege that the note sued on was made by the Defendant.

Defendant demands a trial of this cause by jury.

Harmon K. Stone
Attorneys for Defendant

Harmon K. Stone
Attorneys for Defendant

FILED

SEP 11 1909

ALICE I. DUCK, CLERK
REGISTER

3964

H. KENNEDY,

Plaintiff,

vs.

WILLIAM M. CAMPBELL,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

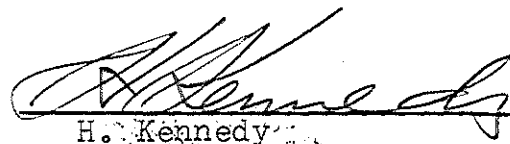
DEMURRER

STATE OF ALABAMA

BALDWIN COUNTY

That certain Judgment rendered in favor of H. Kennedy on the 26th day of February, 1960, against William M. Campbell, Certificate of which is recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Judgment Book 10, Page 47, having been paid, the same is hereby cancelled and discharged of record.

Done this the 18th day of July, 1960.


H. Kennedy

WITNESSES:

Thelma Stephens

STATE OF ALABAMA,
BALDWIN COUNTY

I certify that this instrument was filed on

SEP 12 1960 1:00 PM

and that no tax was collected. Recorded in JulyBook 10
Page 280 W. B. Smith
Judge of ProbateBy W

3964

A. Kennedy
vs
Campbell

RECEIVED
BY THE
CLERK OF THE
COURT
JAN 18 1930

JAN 18 1930

RECEIVED
BY THE
CLERK OF THE
COURT
JAN 18 1930

R. 15

Oliver J. Hurd

STATE OF ALABAMA)
BALDWIN COUNTY) . . . IN THE CIRCUIT COURT . . LAW SIDE . . .

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon William M. Campbell to appear within thirty (30) 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 H. Kennedy.

WITNESS my hand this the 3 day of September, 1959.

Alfred H. Smith
Clerk

Ex 9-4-59

- COMPLAINT -

H. KENNEDY,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
)	
-vs-)	BALDWIN COUNTY, ALABAMA
)	
WILLIAM M. CAMPBELL,)	LAW SIDE
)	
Defendant.)	

COUNT I

The Plaintiff Claims of the Defendant Eight Thousand Seven Hundred Seventy-seven and 17/100 Dollars (\$8,777.17) due by Promissory Note made ^{by the Defendant} on, to-wit, June 14, 1958, and payable in installments on, to-wit, July 1, 1958, January 1, 1959, in the amount of Eight Hundred Seventy-seven and 72/100 Dollars (\$877.72), plus interest, and the sum of Eight Hundred Seventy-seven and 72/100 Dollars (\$877.72), plus interest, on or before the 1st day of each successive July and January thereafter, which said Note provides that default in the payment of any installment on the due date thereof, and said default continuing for one (1) year, shall make all installments due, and default having been made in the said payments due as of July 1, 1958, January 1, 1959, and July 1, 1959, and said default continuing, Plaintiff claims the sum of Eight Thousand Seven Hundred Seventy-seven and 17/100 Dollars

(\$8,777.17) as aforesaid, plus interest at the rate of four per cent (4%) per annum, from June 14, 1958.

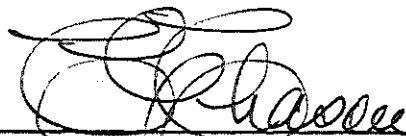
Plaintiff avers that in and by the terms of said Note the Defendant waived all rights of exemption under the Constitution and Laws of Alabama and any other State, and of this Waiver the Plaintiff now claims the benefit.

The 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 this note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of One Thousand Three Hundred Fifty Dollars (\$1,350.00) as such reasonable attorney's fee.

FILED

SEP 3 1959

ALICE J. DUCK, CLERK
REGISTER



Attorney for Plaintiff

no. 3964

SUMMONS AND COMPLAINT

H. KENNEDY,
Plaintiff,
--VS--
WILLIAM M. CAMPBELL,
Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

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FILED

SEP 2 1959

ALICE L. DUCK CLERK
REGISTER

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

Served 3 day of Sept 1959
on 4 day of Sept 1959
Served a copy of the within to
Wm. M. Campbell
service on _____

TAYLOR WILKINS, Sheriff
By Edleigh Steadman D. S.

Robertdale, Ala

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY 62
DEPUTY SHERIFF