SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)
TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:
You are hereby commanded to summons MRS. TED CECIL to appear and plead, answer or demur, within thirty days from therservice hereof, to the complaint filed in the Circuit Court of Baldwin County, Alabama, at the place of holding same by WALTER PETERSEN
Witness my hand this the 24 day of November, 1959.
Ey 11-27-59 Dick Clerk

COMPLAINT WALTER E. PETERSEN, PLAINTIFF IN THE CIRCUIT COURT OF VS: BALDWIN COUNTY, ALABAMA MRS. TED CECIL, AT LAW DEFENDANT

The Plaintiff claims of the defendant THREE HUNDRED TWENTY-SEVEN & 72/100 DOLLARS (\$327.72) due by promissory note made by her on the 14th day of July, 1959, and payable on the 14th day of November 1959, with interest thereon.

Said note provides for a reasonable attorney's fee, which pleintiff alledges to be \$65.00.

The Defendant's Address is: Loxley, Alabama

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no.4025

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

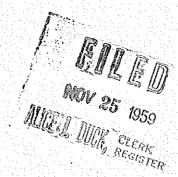
WALTER E. PETERSEN,

PLAINTIFF

VS:

MRS. TED CECIL,

DEFENDANT



LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

The State of Alabama, Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, WALTER E. PETERSON
hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that
TED CECIL
is justly indebted to the Plaintiff Walter E. Petersen
THREE HUNDRED TWENTY-SEVEN & 72/100 (\$327.72) Dollars, and Walter E. Petersen having made affidavit and given bond as required by law, in such cases, you are hereby commanded to attach so much of the estate of Ted Cecil
Ted Cecil
as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such estate, so
attached unless replevied, so to secure, that the same may be liable to further proceedings thereon to be
had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be held at the Court House of said
County, on Within 30 days Monday of 19
next; when and where you must make known to said Court how you have executed this Writ. WITNESS, my hand, this 26 day of October A. D., 19_59
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Clerk

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WALTER E. PETERSON

Vs. ATTACHMENT

TED CECIL

Issued_Oct. 26, 1959

Printed by Moore Printing Co.

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WALTER E. PETERSEN)
PLAINT IFF	IN THE CIRCUIT COURT OF) BALDWIN COUNTY, ALABAMA,
٧s) AT LAW
MRS. TED CECIL)
DEFENDANT	No. 4025

Comes now the Defendant in the above styled cause and files the following pleas to the Plaintiff's Complaint:

1.

Not guilty.

2.

The Defendant says that there is a partial failure of consideration for this note.

3.

That she has paid the amount of the note for the recovery of which this suit was brought before this action was commenced.

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That at the time this action was commenced the Plaintiff was indebted to the Defendant in the amount of \$390.00 for work and labor performed by the Defendant for the Plaintiff which she hereby offers to set off against the demand of the Plaintiff and claims judgment for the excess.

UAN 26 1960 UAN 26 1960

Wilters & Brantley

Attorney for the Defendant

WALTER E. PETERSEN

PLAINTIFF

VS

MRS. TED CECIL

DEFENDANT

PLEAS

FILED TAN 26 1960

AFFIDAVIT FOR ATTACHMENT

STATE OF ALABAMA,)

BALDWIN COUNTY.

Before me, Forest A. Christian, a Notary Public of Baldwin County, personally appeared Walter E. Petersen, who being duly sworn, deposes and saith:

That Ted Cecil will become indebted to the said Walter E.

Petersen in the sum of THREE HUNDRED TWENTY-SEVEN & 72/100 DOLLARS

(\$327.72), which said amount is justly to become due, and that
the said Ted Cecil resides out of the state, and that this attachment is not sued out for the purpose of vexing or harassing the
said defendant.

Walter E. Petersen

Sworn to and subscribed

before me this the 26th day

of October, 19597

*N*ótary Public

FILE U

ALICE J. DUCK, REGISTER

WALTER E. PETERSEN)
PLA INT IFF	IN THE CIRCUIT COURT OF
v s	BALDWIN COUNTY, ALABAMA
MRS. TED CECIL	AT LAW
DEFENDANT)

Comes now the Defendant in the above styled cause and demurs to the Plaintiff's Complaint and for grounds thereof says:

1.

The Complaint fails to state a cause of action.

2.

The Complaint fails to show that the note sued on is due and unpaid.

Wilters & Brantley

FILED DEC 16 1959

ALICE J. DUCK, Clerk

WALTER E. PETERSEN

PLAINTIFF

VS

MRS. TED CECIL

DEFENDANT

DEMURRERS

F [] [E [] D DEG 16 1959 ALICE J. DUCK, Clerk

November 20, 1959

Dear Mrs. Duck:

On the 26th day of October we filed an attachment in this case and you will no doubt wish to assign it to same number in order to save court cost., etc.

Yours very truly,

FOREST A. CHRISTIAN