STATE ABSTRACT AND GUARANTY COMPANY, A Corporation,

Plaintiff,

-VS-

FRANK B. NIHART, J. S. LOWERY, and W. D. STAPLETON,

Defendants.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

Comes the Defendant, W. D. Stapleton, in the above styled cause and for answer to the Complaint filed in said cause and to each and every Count thereof, separately and severally, says:-

1. That the allegations of the Complaint are untrue.

As Attorney for W. D. Stapleton.

STATE ABSTRACT & GUARANTY COMPANY, a corporation, Plaintiff,

vs .

FRANK B. NEIHARDT, J. S. LOWNY and W. D. STAPLETON, Defendants. IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

- 1. Plaintiff claims of the defendants the sum of Three Hundred Twenty-five and 50/100 (\$325.50) Dollars due by account on April 22nd, 1930, which said amount, together with the interest thereon, is due and unpaid.
- 2. Plaintiff claims of the defendants the sum of Three Hundred Twenty-five and 50/100 (\$325.50) Dollars for work and labor performed by the plaintiff for the defendants and at their request, and which said amount is due and unpaid.
- 3. Plaintiff claims of the defendants the sum of Three Hundred Twenty-five and 50/100 (\$325.50) Dollars on an account stated between plaintiff and defendants on or about the 1st day of May, 1930, which said amount, together with the interest thereon is due and unpaid.

Gordon Sugto Ferge

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The State of Alabama }

CIRCUIT COURT-LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon

Frank B. Neihardt, J.S. Lowery and W.D. Stapleton

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 the same, then and there to answer the complaint of State Abstract & Guaranty Company, a corporation, Plaimtiff

Witness my hand, this 9th day of

May

1931

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Clerk.

COMPLAINT

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STATE ABSTRACT & GUARANTY COMPANY, a corporation Plaintiff

VS.

FRANK B.NEIHARDT, J.S. LOWERY and W.D.STAPLETON Defendants

IN CIRCUIT COURT OF BALDWIN COUNTY

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SUMMONS AND COMPLAINT

Filed in office this 9th day of

May A. D. 19 31

MRieum

Clerk.

Gordon, Edington & Leigh Plaintiff's Attorney.

Moore Printing Co. Bay Minette All

For Value Received, PAYABLE at the FIRST NATIONAL BANK MOBILE ALABAMA The Parties to this Instrument, whether Maker, Endorser, Surety, or Guarantor, each for himself, hereby severally agrees to pay this severally agree to pay all costs of collecting, or securing, or attempting to collect or secure this Note, including a reasonable Attorney's fee, waives Demand, Presentment, Protest, Notice of Protest, Suit and all other requirements necessary to hold them. Address Address Address PROMISE TO PAY TO 'NUP ORDER OF SUIT OF SU	である。	No. J. W. H. Mobile, Ala, Feb 14 1009
For Value Received, PAYABLE at the FIRST NATIONAL BANK MOBILE ALABAMA The Parties to this Instrument, whether Maker, Endorser, Surety, or Guarantor, each for himself, hereby severally agrees to pay this severally agree to pay all costs of collecting, or securing, or attempting to collect or secure this Note, including a reasonable Attorney's fee, waives Demand, Presentment, Protest, Notice of Protest, Suit and all other requirements necessary to hold them.		Me Hundry - \$100
walves Demand, Presentment, Protest, Notice of Protest, Suit and all other requirements necessary to hold them.		For Value Received, PAYABLE at the FIRST NATIONAL BANK MOBILE ALABAMA The Parties to this Instrument, whether Maker, Endorser, Surety, or Guarantor, each for himself, hereby severally agrees to pay all costs of collecting, or securing, or attemption, under the Constitution and Laws of Alabama, or any other States and the States and
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The undersigned endorsers each for himself, hereby severally agrees to pay this note and waives as to this debt all right of exemption under the Constitution and Laws of Alabama, or any other state and they each severally agree to pay all costs of collecting or securing, or attempting to collect or secure this mote, including a reasonable attorney's the whether the same be collected or secured by suit or otherwise, and the said endorsers severally waive demand, the said the said endorsers severally waive demand, the said that the said endorsers severally waive demand, the said that the said endorsers severally waive demand, the said that the said endorsers severally waive demand.

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