

CHARLES E. SHEARMAN,

Plaintiff,

vs.

R. C. KEENEY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

Comes the defendant in the above styled cause, and
answering plaintiff's complaint says:

That the matters therein alleged are untrue.

Beebe + Hall
Attorneys for Defendant.

Defendant demands a trial
by Jury:

Beebe + Hall
Attorneys for Defendant.

STATE OF ALABAMA, : :
COUNTY OF BALDWIN. : :

TO ANY SHERIFF OF THE STATE OF ALABAMA...GREETING:

You are hereby commanded to summon R. C. KEENEY to appear before the Circuit Court of said County, at the place of holding the same, within thirty days from the service of this writ, then and there to answer the complaint of CHARLES E. SHEARMAN, hereto attached.

WITNESS my hand this the 16 day of April, 1931.

W. M. Keeney (CLERK)

CHARLES E. SHEARMAN,

Plaintiff,

vs. R. C. KEENEY,

Defendant.

BALDWIN COUNTY,

ALABAMA.

COUNT ONE: Plaintiff claims of the Defendant the sum of One Hundred Eighty-Three and 34/100 (\$183.34) Dollars, balance due from him by promissory note made by him on the 6th day of April, 1922, in amount of Four Hundred Fifteen and 34/100 (\$415.34) Dollars, and payable ninety days after date, which sum of money, with the interest thereon, is still due and unpaid.

Plaintiff avers that in and by the terms of the note hereinabove sued upon the Defendant agreed to pay all cost of collecting, securing or attempting to collect or secure said note, including a reasonable attorney's fee, which Plaintiff claims, to-wit, Fifty Dollars (\$50.00).

Defendant's address
Fairhope, Alabama.

D. J. & H. Gray
ATTORNEYS FOR PLAINTIFF

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Filed April 16th, 1931
J. M. [Signature] Clerk.

Charles F. Shearman
VS
R. C. Keeney.

RECORDED
Original

Executed this the
21st day of April
1931 by Serving Copy
Of the Within Summons
Of Complaint on
R. C. Keeney
W. R. Stuart
Sheriff
W. J. Pruitt
Deputy Sheriff