

STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AMERICAN SECURITIES CORP. OF MOBILE, A CORP.,
PLAINTIFF,

VS.

MISS FLORENCE RUSSELL, An Individual and doing business under the firm
name of TEA TILE TEA ROOM,
DEFENDANT.

COUNT 1. Plaintiff claims of the defendant the sum of \$329.94 due from them by conditional sales contract made by defendant on the 9th day of July, 1930 and due and payable to Nelson's Radios, Inc. or order, which said contract was endorsed and transferred to the plaintiff by Nelson's Radios, Inc. in due course and before maturity and for a valuable consideration. That said contract is payable, \$100.00 cash and balance due in installment payments of \$36.66 each, the first installment being due and payable on 19th day of August, 1930 and one installment payable on the 19th day of each month thereafter until paid in full. That the following installments as provided for in said conditional sales contract are due and unpaid to-wit:

The sum of \$36.66 due and payable on November 19th, 1930,
The sum of \$36.66 due and payable on December 19th, 1930,
The sum of \$36.66 due and payable on January 19th, 1931,
The sum of \$36.66 due and payable on February 19th, 1931,
The sum of \$36.66 due and payable on March 19th, 1931,
The sum of \$36.66 due and payable on April 19th, 1931,
The sum of \$36.66 due and payable on May 19th, 1931,
The sum of \$36.66 due and payable on June 19th, 1931,
The sum of \$36.66 due and payable on July 19th, 1931,

Which sum of money with interest thereon is still due and unpaid.

Plaintiff avers that in and by the terms of said conditional sales contract the defendant waived all right to have exempted to them any personal property, which is now or may hereafter be exempted to them under the Constitution and Laws of the State of Alabama.

Plaintiff avers that in and by the terms of said conditional sales contract the defendant agreed to pay a reasonable attorney's fee for the collection of said debt, which plaintiff claims, to-wit, 15 per cent of the amount due and exigible.

Defendant's address:
Fairhope, Ala.


ATTORNEY FOR PLAINTIFF

Original

Filed Aug 17th 1931
D. W. Rice
Clerk.

The State of Alabama, BALDWIN County

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon Miss Florence Russell, an individual
and doing business under the firm name of Tea Tile Tea Room,

to appear in the Circuit Court of Baldwin County, Alabama, at the place
of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of
American Sureties Corp. of Mobile, a corporation

Witness this 19th day of August, 1931

J. M. Rice, Clerk.

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT.

COMPLAINT

VS.

Plaintiff

Defendant.....

And the Plaintiff.....claim..... of the Defendant.....

Dollars, due

The State of Alabama

BAIDWIN County

CIRCUIT COURT

American Securities corp.

of Mobile, a corporation

Plaintiff

vs.

Miss Florence Russell, doing
business as Tea Tile Tea
Room

Defendant

Summons and Complaint

Filed this **19th** day of

August, 19**31**

W. A. Cowan
Clerk.

W. A. Cowan

Plaintiff's Attorney.

Received this _____ day

of _____, 19____

_____, Sheriff.

Executed this **32d** day

of **Sept**, 19**31**, by

leaving a copy of the within Summons and Com-
plaint with

Miss Florence Russell
and doing business as Tea Tile Tea Room
W. A. Cowan
W. A. Cowan Sheriff.

The State of Alabama,

_____, COUNTY

To the Sheriff of _____ County:

Whereas, the Plaintiff..... in the within stated
cause ha..... made affidavit and given bond as
required by law, you are hereby required to
take the property mentioned in the complaint
into your possession, unless the Defendant.....
give..... bond payable to the Plaintiff..... with
sufficient surety in double the amount of the
value of the property, with condition that if the
Defendant

cost in the suit,.....
within thirty days thereafter, deliver the property
to the Plaintiff....., and pay all costs and damages
which may accrue from the detention thereof.

_____, Clerk.