

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 Nelson M. Ellis 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 same, then and there to answer the Complaint of the Peoples Fertilizer Company, a Corporation.

Witness my hand this 10th day of September, 1931.

D. M. McCremon
Clerk.

COMPLAINT.

PEOPLES FERTILIZER COMPANY,
A Corporation,

Plaintiff,

-vs-

NELSON M. ELLIS,

Defendant.

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

The Plaintiff claims of the Defendant the following described personal property, viz:

Two mules and one cow; Also all farming implements owned by Nelson M. Ellis on May 1st, 1931;

with the value of the hire or use thereof during the period of detention, viz, from the 1st day of May, 1931.

Lyford Hend & Chason
Attorneys for Plaintiff.

STATE OF ALABAMA,

BALDWIN COUNTY.

AFFIDAVIT.

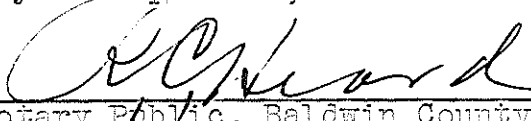
Before me, the undersigned authority in and for said State and County, personally appeared W. M. Stuart, who is known to me and who, after being by me first duly and legally sworn doth depose and say under oath as follows:

That his name is W. M. Stuart; that he is the President of the Peoples Fertilizer Company, and as such is duly authorized to make this affidavit; that the property sued for in the Complaint of Peoples Fertilizer Company, a Corporation, vs. Nelson M. Ellis, viz:-

Two mules and one cow; Also all farming implements owned by Nelson M. Ellis on May 1st, 1931;

is the property of the Peoples Fertilizer Company.

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed, this 10th day of September, 1931.


Notary Public, Baldwin County,
State of Alabama.

STATE OF ALABAMA,
BALDWIN COUNTY.

KNOW ALL MEN BY THESE PRESENTS: That the Peoples Fertilizer Company, a Corporation, as Principal, and the undersigned as Sureties, are held and firmly bound unto Nelson M. Ellis, his heirs, executors and administrators, in the sum of Fifty Dollars (\$50.00), for the payment of which well and truly to be made we bind ourselves, our and each of our heirs, successors, executors and administrators, jointly and severally, firmly by these presents.

Sealed with our seals and dated this _____ day of September, 1931.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH: That Whereas, the above bound Peoples Fertilizer Company, a Corporation, has on this day sued out from the Office of the Clerk of the Circuit Court of Baldwin County, Alabama, a Writ of Detinue returnable at the next term of said Court, in said Court, against the said Nelson M. Ellis for the recovery of the following described personal property, viz:

Two mules and one cow; Also all farming implements owned by Nelson M. Ellis on May 1st, 1931;

Now, if the said Peoples Fertilizer Company, a Corporation, shall fail in said suit and shall pay to the said Nelson M. Ellis all such costs and damages as he may sustain by the wrongful complaint, or shall prosecute said suit to effect, then this obligation to be void, otherwise to remain in full force and effect.

PEOPLES FERTILIZER COMPANY,
A Corporation,

By [Signature] SEAL
As its President.

[Signature] SEAL

[Signature] SEAL.

Taken and approved this
10 day of September,
1931.

[Signature]
Clerk of the Circuit Court
of Baldwin County, Alabama.

STATE OF ALABAMA,

BALDWIN COUNTY.

AFFIDAVIT.

Before me, the undersigned authority in and for said State and County, personally appeared W. M. Stuart who is known to me and who, after being by me first duly and legally sworn doth depose and say under oath as follows:

That he is the President and Agent of and for the Peoples Fertilizer Company, a Corporation, and as such is duly authorized to make this Affidavit; that the following described property, to-wit:

One Black Horse about nine years old, named George, weight about 1200 lbs.; One-One Horse John Deer Wagon complete with harness; Twelve head of hogs, being all hogs owned by Forest A. Peterson on February 24th, 1930;

for the recovery of which it has instituted suit this day in the Circuit Court of Baldwin County, Alabama, against Forest A. Peterson, is the property of said Company.

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed, this 9th day of September, 1931.

John Shason
Notary Public, Baldwin County,
State of Alabama.

STATE OF ALABAMA,
BALDWIN COUNTY.

KNOW ALL MEN BY THESE PRESENTS: That the Peoples Fertilizer Company, a Corporation, as Principal, and the undersigned as Sureties, are held and firmly bound unto Forest A. Peterson, his heirs, executors and administrators, in the sum of Fifty Dollars (\$50.00) for the payment of which well and truly to be made we bind ourselves, our and each of our heirs, successors, executors and administrators, jointly and severally, firmly by these presents.

Sealed with our seals and dated this _____ day of September, 1931.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH: That Whereas, the above bound Peoples Fertilizer Company, a Corporation, has on this day sued out from the Office of the Clerk of the Circuit Court of Baldwin County, Alabama, a Writ of Detinue returnable at the next term of said Court, in said Court, against the said Forest A. Peterson for the recovery of the following described personal property, viz:

One Black Horse about nine years old, named George, weight about 1200 lbs.; One Horse John Deere Wagon complete with harness; Twelve head of hogs, being all hogs owned by Forest A. Peterson on February 24th, 1930.

Now, if the said Peoples Fertilizer Company, a Corporation, shall fail in said suit and shall pay to the said Forest A. Peterson all such costs and damages as he may sustain by the wrongful complaint, or shall prosecute said suit to effect, then this obligation to be void, otherwise to remain in full force and effect.

PEOPLES FERTILIZER COMPANY,
A Corporation,

By [Signature] SEAL
As its President.

[Signature] SEAL

[Signature] SEAL

Taken and approved this 9th
day of September, 1931.

[Signature]
Clerk of the Circuit Court of
Baldwin County, Alabama.

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 Joseph Marco to appear within thirty days from the service of this Writ in the Circuit Court to be held in said County at the place of holding same, then and there to answer the complaint of A. A. Corte & Sons, a Co-partnership composed of A. A. Corte, Ernest Corte and John Corte.

Witness my hand this 3rd day of September, 1931.

J. W. Richardson
Clerk.

COMPLAINT.

A. A. CORTE & SONS, a Co-part-)
nership composed of A. A. Corte,)
Ernest Corte and John Corte,) IN THE CIRCUIT COURT-LAW SIDE
Plaintiffs,) STATE OF ALABAMA
-vs-) BALDWIN COUNTY.
JOSEPH MARCO,)
Defendant.)

The Plaintiff claims of the Defendant Four Hundred Forty & No/100 Dollars (\$440.00) due by promissory Note made by him on, to-wit, January 23rd, 1931 and payable on, to-wit, May 15th, 1931, with interest from date.

Plaintiff alleges and avers that in, by and as a part of said Note Defendant waived all right of exemption under the Constitution and Laws of Alabama or any other State as to personal property as against the payment of this Note, and of this waiver the Plaintiff now claims the benefit.

The Plaintiff further alleges and avers that in, by and as a part of said Note Defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure, such debt including a reasonable attorneys' fee, and the Plaintiff further claims of the Defendant the further and additional sum of Sixty

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& No/100 Dollars (\$60.00) as such reasonable attorneys' fee.

Plaintiff admits credit of One Hundred Seventy-five &
No/100 Dollars (\$175.00) on said Note. All of which sums of money,
together with interest thereon, are due and unpaid.

Hyatt, Heard & Chavon
Attorneys for Plaintiff.

LAW OFFICES
MURBORNE STONE

A. A. CORTE & SONS, a Co-
partnership composed of A. A.
Corte, Ernest Corte and John
Corte,

Plaintiffs,

-vs-

JOSEPH MARCO,

Defendant.

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

MOTION FOR JUDGMENT BY DEFAULT.

Comes the Plaintiff in the above styled cause and shows unto the Court that personal service against the above named Defendant was had on September 7th, 1931, and that no answer has been made by the Defendant, and asks that a Judgment by default be rendered against the Defendant in this cause.

Robert Howard & Phelan
Attorneys for Plaintiff.