

Henry B. Payne, Plaintiff,)

vs.

;-In the Circuit Court of Baldwin Co.,Alabama.

L. A. Funk, Defendant.)

.....

Complaint.

1.Plaintiff claims of the defendant the sum of \$200.00,due by promissory note made by him on the 10th.day of December,1929, and payable on demand,with interest thereon.Said note waives all the exemptions of personally allowed by the laws of the state of Alabama and provides for a reasonable attorney's fee and cost of collecting,securing or attempting to collect the note.

2.Plaintiff further claims of the defedant the sum of \$30.00, as a reasonable attorney's fee,the note sued on in count one providing that the maker shall pay a reasonable attorney's fee, for bringing this suit,etc.

Gay Bann Cleveland
Attorney for plaintiff.

(Defendant resides at Fairhope,Ala.)

The State of Alabama, BALDWIN County

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon

L. A. Funk

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

Henry B. Payne

Witness this 18th day of August, 19 31

J. W. Rimmer, 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

As per
RECORDED

The State of Alabama
Baldwin County

CIRCUIT COURT

Henry B. Payne

Plaintiff

vs.

L. A. Funk

Defendant

Summons and Complaint

Filed this 18th day of
August 1931

George Bowen Cleveland
Clerk.

George Bowen Cleveland
Plaintiff's Attorney.

Received this _____ day
of _____, 19____

_____, Sheriff.

Executed this *72nd* day
of *Sept.*, 19*31*, by
leaving a copy of the within Summons and Com-
plaint with

L. A. Funk
Defendant.

W. R. Stuart
W. R. Stuart D.S. 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.

The undersigned endorsers
assume the contract shown by
the face of this note.

Porto Henry B. Payne
~~BANK OF FAIRHOPE, Fairhope, Ala.~~

Without recourse.

By Henry H. Parker
Cashier

Filed at 13/43

T. M. Parker
Cash

BANK OF FAIRHOPE

\$ 200.00

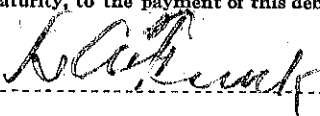
FAIRHOPE, ALA., December 10 1929

Demand after date, without grace, I promise to pay to the
order of Bank of Fairhope Fairhope Ala.
Two hundred and no/00---

DOLLARS

For value received. Payable at the BANK OF FAIRHOPE, Fairhope, Alabama.

The parties to this instrument, whether maker, endorser, surety or guarantor, each for himself, hereby severally agrees to pay this note and waives as to this debt, or any renewal thereof, all right to exemption under the constitution and laws of Alabama, or any other state, as to personal property and they each severally agree to pay all costs of collecting, or securing, or attempting to collect or secure this note, including a reasonable attorney's fee, whether the same be collected or secured by suit or otherwise. And the maker, endorser, surety or guarantor of this note severally waives demand, presentment, protest, notice of protest, suit and all other requirements necessary to hold them, and they agree that time of payment may be extended without notice to them of such extension. The bank at which this note is payable is hereby authorized to apply on or after maturity, to the payment of this debt any funds in said bank belonging to the maker, surety, endorser, guarantor, or any one of them.



DUE