

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 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 3rd day of September, 1931.

J. W. Williams
Clerk.

COMPLAINT.

PEOPLES FERTILIZER COMPANY,
A Corporation,

Plaintiff,

-VS-

JOSEPH MARCO,

Defendant.

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

The Plaintiff claims of the Defendant Sixteen Hundred Eighty-nine & 85/100 Dollars (\$1689.85) due by Promissory Note made by him on, to-wit, March 19th, 1931 and payable on, to-wit, May 1st, 1931, with interest thereon.

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

Plaintiff further alleges and avers that in, by and as a part of said Note the 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 Two Hundred Twenty-five & No/100 Dollars (\$225.00) as such reasonable attorneys' fee.

Plaintiff admits credit of Four Hundred Fifteen & 35/100 Dollars (\$415.35) on said Note. All of which sums of money, to-

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gether with interest thereon, are due and unpaid.

Hyatt, Heard & Chess
Attorneys for Plaintiff.

LAW OFFICES
MORRIS STONE

PEOPLES FERTILIZER COMPANY,
A Corporation,

Plaintiff,

-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.

Walter Head & Chas. H. Head
Attorneys for Plaintiff.