

Original

No.

The State of Alabama,

Baldwin County.

CIRCUIT COURT.

Proper Parties

vs. Plaintiffs.

Boldreus Dunge
Julius Dunge
Defendants.

SUMMONS AND COMPLAINT.

Filed *Nov 2* 1915

W. H. Cummins Clerk.

Defendant lives at

Elberta

Plaintiff's Attorney.

Defendant's Attorney.

THE BALDWIN TIMES PRINT

Received in office

Nov 2nd 1915

W. E. Embury Sheriff

I have executed this Writ

this *2nd day Nov.* 1915
by leaving a copy of the within sum-
mons and complaint with

Each of the within
named defendants

me the jury find
for Plaintiff and
assess Plaintiff
damages at
ninety five \$89.00
dollars

R. B. Wilson

foreman

W. E. Embury Sheriff

by J. L. Connerly Deputy Sheriff

SUMMONS AND COMPLAINT

The State of Alabama, {
Baldwin County. } No.

CIRCUIT COURT.

9th Term, 1915

To any Sheriff of the State of Alabama:

You are hereby commanded to summon

Boldirsar Dusza and Julius Dusza

to appear at the next term of the Circuit Court to be held for said County at the place of holding the same, then and there to answer the complaint of

PEOPLES FERTILIZER COMPANY, a corporation

Witness my hand, this *2nd* day of

Nov

1915

J. T. Williams Clerk

COMPLAINT

Peoples Fertilizer Company
a corporation

Plaintiffs

vs.

Boldirsar Dusza
Julius Dusza.

Defendants

The plaintiff claim^s of the Defendant

Eighty Five & 77/100ths Dollars, due
by promissory note made signed and executed by defendants on to-wit
March 16th. 1915 and payable on or before November 1st. 1915 at Baldwin
County Bank at Bay Minette, Ala.

Plaintiff further claims of defendant the further sum of Fifteen Dollars
as a reasonable attorneys fee for collecting or securing said debt
which defendants in said note agreed to pay.

Plaintiff avers that in said note ~~both parties~~ defendants waived all exemptions under the laws of The
State of Alabama and the United States.

All of which sums of money are still due and unpaid together with interest
thereon.

Frank Storer
Plaintiffs Attorney

\$ 80-27

Elberta

Bay Minette, Baldwin County, Ala., March 16-1917

On on before Mar. 1st 1917 I or we, promise to pay PEOPLES
FERTILIZER COMPANY, or order Eighty Five & 77/100 Dollars
for value received, negotiable and payable at Baldwin County Bank, Bay Minette, Ala.

And to secure the payment of this note and any other sum I or we, may owe the payee before this note is paid, I or we, mortgage to said payee unincumbered property as follows:

My or our entire crops of Cotton, Corn, Potatoes and Farm Products, and all rents accruing to me or us for the year 1917, and each succeeding year in the county in which I or we, now reside or which I or we, may hereafter reside in, until paid, and empower said payee or his endorsee to take possession of and sell the same whenever he deems himself insecure, by posting a notice of the place and terms of sale at the Court House, and I or we, hereby waive all exemptions under the laws of the State of Alabama and the United States and agree to pay reasonable attorney's fee, for collecting or securing same if not paid when due.

WITNESSES:

Joe Patterson

J. H. Sebastian

Boldassar Duszka

Julius Duszka

No. 470-219-386 Due



STATE OF ALABAMA, }

Baldwin County, }

J. H. H. Smith, Judge of

Probate for said county, hereby certify that the within

privilege tax has been paid on the within instrument as re-

quired by Acts 1902 & 1908 viz \$ 1.50 cts. 1.50

J. H. H. Smith Judge of Probate

By J. H. H. Smith Clerk

THE STATE OF ALABAMA, } Office of the Judge of
BALDWIN COUNTY. } the Probate Court.

I, J. H. H. SMITH, Judge of said Court in and for
said County, do hereby certify that the within instru-

ment was filed in this office for record on the 19th

day of March 1915, at —

o'clock —, and I further certify that the

same is duly recorded in Record Book No. 157 mp

Page 46 and duly examined.

Witness my hand this 25th day of

March 1915.

J. H. H. Smith Judge of Probate Court

By J. H. H. Smith Clerk

CC-567
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