

CHARLES H. HENDERSON,
PLAINTIFF,

VS.

W. D. STAPLETON,
DEFENDANT.

CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

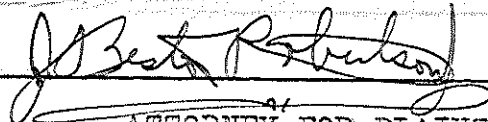
Comes the plaintiff in the above styled cause, and
amends his complaint to read as follows:

AMENDED COMPLAINT.

Plaintiff claims of the defendant the sum of five thousand dollars (\$5,000.00), due by promissory note made by him on the 1st day of July, 1930 and payable on the 1st day of September, 1930, to W. B. Folmar & Sons Bankers, and endorsed by W. B. Folmar & Sons Bankers before maturity to Plaintiff, which sum of money with interest thereon is still due and unpaid.

Plaintiff further claims of the defendant the sum of seven hundred and eighty dollars (\$780.00) amount due as attorney's fee, and avers that by the term of said note defendant agreed and obligated himself to pay a reasonable attorney's fee in the event same was placed in the hands of an attorney for collection, and that seven hundred and eighty dollars (\$780.00) is a reasonable fee, which amount plaintiff further claims of defendant.

Plaintiff further alleges that in and under the terms of said note defendant waives as to this debt all rights of exemption under the constitution and laws of Alabama, or any other state.



ATTORNEY FOR PLAINTIFF

*Filed
Mar 18/1932
J. M. Kimm
clerk*

9567
RECORDED

Chas H. Hudson
C.S.

W.D. Hapler

Amended Complaint

Filed Mar 18/932

T.W. Reardon
Clerk

J. Butler Robertson Jr
Att'y for Plff.

The State of Alabama }
Baldwin County

CIRCUIT COURT--LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon

W.D. STAPLETON

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 the same, then and there to answer the ^{amended} complaint of

CHARLES H. HENDERSON

Witness my hand, this 2nd day of December 19 32

J. M. [Signature]

Clerk.

COMPLAINT

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(ORIGINAL)

RECORDED

CHARLES H. HENDERSON

VS.

W.D. STAPLETON

IN CIRCUIT COURT OF BALDWIN COUNTY

Term 19

Amended
SUMMONS AND COMPLAINT

Filed in office this 18 day of
March A. D. 1932

Clerk.

J.B. ROBERTSON, JR.
Plaintiff's Attorney.

Moore Printing Co. Bay Minette, Ala.

to Hm Hall
12/2/32

Received in office day of
19

Sheriff of _____ County, Ala.

Executed by serving cop 7
of the within Summons and Complaint on
Hm Hall as
Member of the
firm of Beebe &
Hall
Defendant

This the 2 day of Dec 1932

A.R. Stuart
Sheriff of *Baldwin* County, Ala.
By _____ Deputy Sheriff.

CHARLES H. HENDERSON,
Plaintiff,

vs.

W. D. STAPLETON,
Defendant.

CIRCUIT COURT OF BALDWIN

COUNTY, ALABAMA.

AT LAW.

Comes the defendant in the above styled cause and,
demurring to plaintiff's complaint, says:

FIRST: Said complaint does not state a cause of
action.

SECOND: Said complaint does not describe the note
sued upon with sufficient certainty to apprise the defendant
with what he is called upon to answer.

THIRD: Said complaint does not allege when the
said note was executed.

FOURTH: Said complaint does not allege when the said
note is due.

FIFTH: The said complaint does not allege that the
said note is due and unpaid.

Biebel Hall
ATTORNEYS FOR DEFENDANT.

Defendant demands a trial by

Jury of the foregoing cause.

Biebel Hall
Attorneys for Defendant.

CHARLES H. HENDERSON
PLAINTIFF

VS

W. D. STAPLETON
DEFENDANT

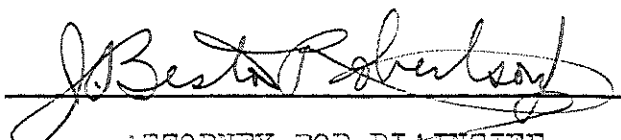
CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA

AT LAW

Plaintiff claims of the Defendant the sum of five thousand dollars (\$5,000.00), due by promissory note, payable to W. B. Folmar & Sons Bankers and endorsed by W. B. Folmar & Sons Bankers to Plaintiff, on to-wit, September 1, 1930, which sum of money with the interest thereon is still due and unpaid.

Plaintiff further claims of the Defendant the sum of seven hundred and eighty dollars (\$780.00) amount due as attorney's fee, and avers that by the term of said note Defendant agreed and obligated himself to pay a reasonable attorney's fee in the event same was placed in the hands of an attorney for collection, and that seven hundred and eighty dollars (\$780.00) is a reasonable fee, which amount Plaintiff further claims of Defendant.

Plaintiff further alleges that in and under the terms of said note Defendant waives as to this debt all rights of exemption under the constitution and laws of Alabama, or any other state.


ATTORNEY FOR PLAINTIFF

Defendant's address is Bay Minette, Ala.

The State of Alabama, BALDWIN County

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon

W. D. Stapleton

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

Charles H. Henderson

Witness this 1st day of January, 1932

J. W. Richardson, 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

<p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Plaintiff</p>	<p>VS.</p>	<p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Defendant</p>
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And the Plaintiff claim of the Defendant

_____ Dollars, due

No. _____

The State of Alabama

BALDWIN

County

CIRCUIT COURT

CHARLES H. HENDERSON

Plaintiff

vs.

W. D. STAPLETON

Defendant

Summons and Complaint

Filed this 1st day of

January

19 32

Clerk.

J. Bestor Robertson

Plaintiff's Attorney.

Received this

11/32

day

of

19

Sheriff.

Executed this

2nd

day

of

January

1932

leaving a copy of the within Summons and Complaint with

Defendant

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.