CHARLES H. HENDERSON PLAINTIFF

1 VS

DR. R. A. HAIL
DEFENDANT

CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA

AT LAW

Plaintiff claims of the Defendant the sum of four hundred and fifty dollars (\$450.00) due by promissory note, payable to Plaintiff, on to-wit, June 4, 1931, which sum of money with the interest thereon is still due and unpaid.

Plaintiff further claims of the Defendant the sum of seventyone dollars and twentyone cents (\$71.21) amount due as attorney's fee, and avers that by the terms 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 seventyone dollars and twentyone cents (\$71.21) 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 Robertsdale, Ala.

Original Filed Jan 12t 1932 Miceron

CODE 1923-9417

## Origin ORDED

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Count

#### CIRCUIT COURT

Charles II. Henderson
Plaintiff

Dr. R. A. Hail

Defendant.....

#### Summons and Complaint

Filed this 1st day of 19.32.

Millian Clerk.

J. Bustur Palntiff's Attorney.

1/32

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		Sheriff.

### The State of Alabama,

....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.

CHARLES H. HENDERSON,

Plaintiff.

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v s

IN THE CIRCUIT COURT OF

R. A. HAIL,

Defendant.

BALDWIN COUNTY, ALABAMA.

The defendant demurs to the Complaint upon the following grounds:

FIRST: It does not set out the date of the note sued upon.

SECOND: It does not set out the date when said note becomes due.

Attorney for Defendant.

Clait b. Qui Lly

# RECORDED

CHARLES H. HENDERSON

Pleintiff.

VS

R. A. HAIL

Defendant.

DEMURRER.

Filed Feb 27/932

Elliott G. Bickorby.