

CHARLES W. SHOOP and HAZEL
MAE SHOOP,

Plaintiffs,

vs.

MANCIL PATRICK and MARGARET
N. PATRICK,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

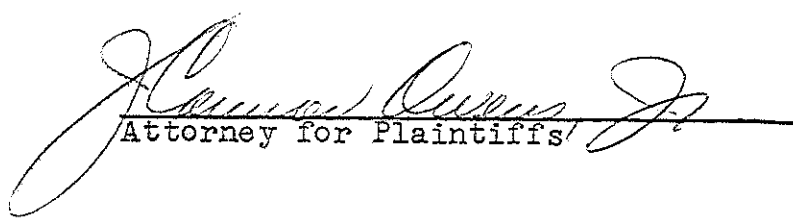
AT LAW

NO. 4448

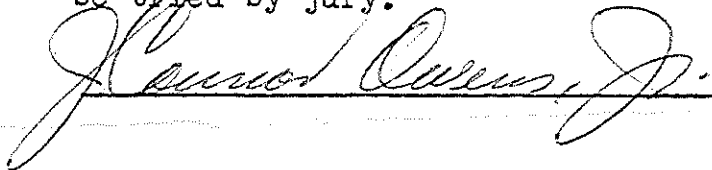
The Plaintiffs claim of the Defendants, Mancil Patrick and Margaret N. Patrick, Two Thousand Five Hundred (\$2,500.00) Dollars, due by promissory note under seal made by them on the 15th day of May, 1953 and payable on July 10th, 1953, with interest thereon from July 30th, 1956, at the rate of 4% per annum.

Plaintiffs allege that in and by the terms of said note, the Defendants waived all rights of homestead under the Laws of the State of Alabama, and Plaintiffs claim the right of said waiver.

Plaintiffs further allege that in and by the terms of said note the Defendants agreed to pay all costs of collecting or securing the said note, including a reasonable attorney's fee, and the Plaintiffs claim the further and additional sum of \$400.00 as a reasonable attorney's fee in the premises.


Attorney for Plaintiffs

Plaintiffs demand that this cause
be tried by jury.



FILED
OCT 11 1960
ALICE L. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.

OCTOBER TERM, 19 60

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon MANCIL PATRICK and MARGARET N. PATRICK

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

MANCIL PATRICK and MARGARET N. PATRICK Defendant. s

by

CHARLES W. SHOOP and HAZEL MAE SHOOP Plaintiffs

Witness my hand this 11 day of Oct 19 60

Reigel Clerk

Defendants reside in Fairhope, Alabama

Served 11 day of Oct 1960
on 18 day of Oct 1960
served a copy of the within P.C.
Mail Patrick
Margaret A. Patrick
service on _____

TAYLOR WILKINS Sheriff
By W. O. Barker, S.
Thope

Sheriff claims 140 miles at
Ten Cents per mile Total \$ 14.00
TAYLOR WILKINS, Sheriff
BY Barker
DEPUTY SHERIFF

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ALICE J. DUCK, CLERK
REGISTER

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
Dahlberg Building
BAY MINETTE, ALABAMA

CHARLES W. SHOOP
and HAZEL MAE SHOOP
Plaintiff

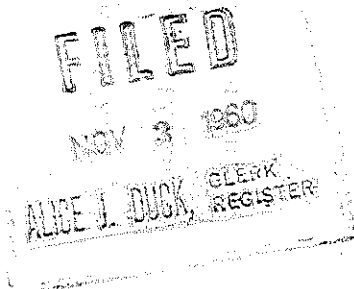
VS

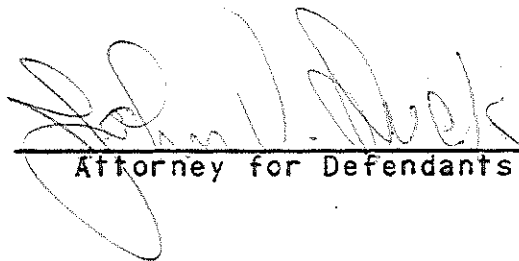
MANCIL PATRICK and
MARGARET N. PATRICK
Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Comes now the defendants in the above styled cause and
for answer to the Bill of Complaint says:

ONE: Not guilty.




Attorney for Defendants

4448

CHARLES W. SHOOP
and HAZEL MAE SHOOP

Plaintiff

VS

MANCIL PATRICK and
MARGARET N. PATRICK
Defendants

FILED

NOV 3 1960

ALICE J. DUCK, CLERK
REGISTER