

H. C. JORDAN

PLAINTIFF

VS

EVELYN HAGER

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 4312

Comes now the Defendant in the above styled cause and files this her
demurrers against the Plaintiff's Complaint and for grounds thereof says:

1.

That in Count 1 on the Complaint it alleges that the Defendant is a
him and that the service was had upon Evelyn Hager, a woman.

2.

The complaint fails to allege how much the interest of the note is,
for ought appears this may be usury.

Wilters & Brantley

BY: 

Attorneys for the Defendant

The defendant demands a trial by jury.

Wilters & Brantley

BY: 

Attorneys for the Defendant

Filed
8-4-60

4312

Jury

H. C. JORDAN

PLAINTIFF

VS

EVELYN HAGER

DEFENDANT

DEMURRERS

FILED

AUG 4 1960

ALICE T. DUCK, CLERK
REGISTER

STATE OF ALABAMA)
BALDWIN COUNTY)

CIRCUIT COURT

No. _____

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon Evelyn Hager 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 complaint of H. C. Jordan.

Witness my hand this 7 day of ~~July~~, 1960.

Alice J. Duck
Clerk

H. C. JORDAN,
Plaintiff
versus
EVELYN HAGER,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE:

Plaintiff claims of the Defendant the sum of Three Hundred Twenty Six and .02/100 (\$326.02) Dollars, due by promissory note made by him on, to-wit, the 10th day of August, 1957, and which sum was due and payable to-wit October 10, 1957, which sum of money with interest thereon is due and unpaid; and Plaintiff avers that in and by the terms of said note, the Defendant waived all rights of exemption under the laws of the State of Alabama, and the Plaintiff claims the benefit of said waiver; Plaintiff claims the additional sum of Seventy Five and 00/100 (\$75.00) Dollars, as attorney fees for bringing this suit for that the Defendant in and by the terms of said note agreed to pay a reasonable sum as attorney fees and Plaintiff avers that said amount is a reasonable attorney fee for the bringing and prosecuting of this suit.

Charles B. Bailey
ATTORNEY FOR PLAINTIFF

FILED
JUL 7 1960
(ALICE J. DUCK, Clerk)

4312

Given 8⁷ day of July 1960
on 8⁷ day of July 1960
and a copy of the within 29C
Evelyn Hager
service on _____

TAYLOR WILKINS, Sheriff
By W. O. Garner S.
Silverhill

Sheriff claims 60 miles at
Ten Cents per mile Total \$ 6.00
TAYLOR WILKINS, Sheriff
BY Garner
DEPUTY SHERIFF

H. C. JORDAN,
Plaintiff
versus
EVELYN HAGER,
Defendant.

Defendant lives
in Silverhill.

FILED
JUL 7 1960
(ALICE J. DUCK, Clerk)