

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No.

JANUARY TERM, 19 60

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WALLACE JOHNSTON

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

..... WALLACE JOHNSTON, Defendant

by MARY LEE BLACKSTON

....., Plaintiff

Witness my hand this 3 day of File ~~January~~ 19 60

Ed 2-4-60 Adrian J. Neuck, Clerk

No. _____ Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed _____ 19____

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19____

Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

Sheriff

Deputy Sheriff

MARY LEE BLACKSTON,
PLAINTIFF,
VS.
WALLACE JOHNSTON,
DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN LAW NO. _____.

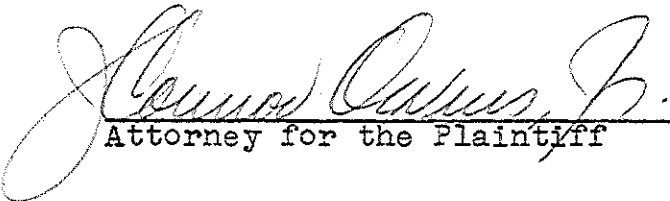
COUNT I

Plaintiff claims of the Defendant \$600.00 due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 14th day of December, 1956, which sum of money with interest thereon, is still unpaid.

COUNT II

The Plaintiff claims from the Defendant \$600.00, damages for breach of an agreement entered into by him on the 14th day of December, 1956, by which the said Defendant promised to pay to the Plaintiff for the balance due for certain goods, chattels and equipment the sum of \$50.00 per month, the first payment to be made on the 15th day of January, 1957 and a like payment to be made on the 15th of each and every month thereafter until the full amount of \$600.00 shall have been paid in full. That the said Defendant has made no payments to Plaintiff as set out.

FILED
FEB 3 1960
ALICE L. DUCK, CLERK
REGISTER


Attorney for the Plaintiff

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN LAW NO. 111614

MARY LEE BLACKSTON,
PLAINTIFF,
VS.
WALLACE JOHNSTON,
DEFENDANT.

SUMMONS AND COMPLAINT

FILED
FEB 3 1960
ALICE L. DUCK, CLERK
REGISTER

LAW OFFICES OF
J. CONNOR OWENS, JR.
101 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA

Received 3 day of Feb. 1960
and on 4 day of Feb 1960
I served a copy of the within L & C
on Wallace Johnston
By service on _____

TAYLOR WILKINS, Sheriff
By Edlight Steadham D. S.

Causeway

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

Defendant does business

KNOW ALL MEN BY THESE PRESENTS, That I, Mary Lee Blackston for and in consideration of \$670.00 to be paid to me by Wallace Johnston, the buyer as herein after set out do hereby grant, bargain, sell and convey unto the said Wallace Johnston, the following described property:

1 General Electric Stove	\$250.00
1 Philco Refrigerator	\$250.00
1 Ettargere	\$45.00
1 Victorian Chair	\$75.00
1 Launge Chair	\$50.00

It is understood and agreed that the buyer, Wallace Johnston has paid to the seller Mary Lee Johnston the sum of \$70.00 leaving a balance of \$600.00 to be paid by the buyer to the seller at \$50.00 per-month the first payment to be made on the 15th day of January, 1957 and a like sum to be paid to the seller on the 15th of each and every month thereafter until the full amount shall have been paid in full. And it is further agreed by and between the parties that to secure, the payments, hereinafter to become due as above set out that the seller retains title of said property as a further security of said payments until the same shall have been paid in full.

The seller warrants that the said property is free from all encumbrances and that the same is located in Mobile County, Alabama.

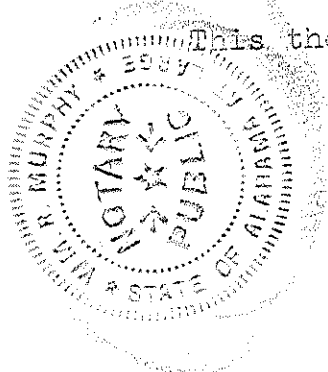
Given under my hand this the 14th day of December, 1956.

STATE OF ALA. MOBILE CO.
NOTARY PUBLIC
FILED ON
DEC 10 12 57 PM '56
RECORDED & INDEXED
ADDED TAX HAS BEEN
PAID IN THIS INSTRUMENT.
JUDGE OF PROBATE

Mary Lee Blackston (SEAL)
Wallace Johnston (SEAL)

I, J. R. Murphy a Notary Public in and for said State and County do hereby certify that Mary Lee Blackston and Wallace Johnston who are known to me acknowledged before me that they know the contents of the foregoing and that they executed the same on the day the same bears date.

This the 14th day of December, 1956.



J. R. Murphy
NOTARY PUBLIC MOBILE COUNTY, ALABAMA
Attest Alvin L. Lave

100
85
10
70
32.5

351033

of RECORDED

Mary Lee Blackston
— To —
Wallace Johnston

Misc. BOOK 365 PAGE 55

Received of Mary Lee Blackston
the sum of \$100.00
for the purchase of land