(4/95)

MRS. W. F. GILMORE, Individually and d/b/a FAIRWOOD GROCERY

Plaintiff

-VS-

JOHN AND MARGARET SIMS, Jointly and Individually

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

BILL OF COMPLAINT COUNT ONE:

Plaintiff claims of the Defendants the sum of SIX HUNDRED and SIXTY-NINE (\$669.00)Dollars, due from them by account from on to-wit the 31st day of July, 1957, until on to-wit the 14th day of July, 1958, which sum of money with the interest thereon, is still unpaid.

COUNT TWO:

Plaintiff claims of the Defendants the sum of SIX HUNDRED and SIXTY-NINE (\$669.00)Dollars, due from them on an account stated between the Plaintiff and the Defendants on the 14th day of July, 1958, which sum of money with the interest thereon, is still unpaid.

COUNT THREE:

Plaintiff claims of the Defendant, Margaret Sims, the sum of SIX HUNDRED and SIXTY-NINE (\$669.00)Pollars, due by Promissory Note made by her on the 5th day of December, 1958, and payable on demand, with the interest thereon.

The Plaintiff avers that in, by and as a part of said Note the Defendant, Margaret Sims, agreed to pay all costs of collecting or securing or attempting to collect or secure such debt including a reasonable Attorney's fee, whether the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant the further and additional sum of ONE HUNDRED and THIRTY—FIVE (\$135.00)Dollars, as a reasonable Attorney's fee.

Plaintiff further avers that in, by and as a part of said Note the Defendant waived as to this debt or any renewal thereof, all rights to exemptions under the Constitution and Laws of the State of Alabama, as to personal property and of this waiver the Plaintiff

now claims the benefit.

Attorney for Plaintiff

Defendants reside at : Gayfer Street, Fairhope, Ala. JOHN V. DUCK
ATTORNEY AT LAW
FAIRHOPE, ALA.
Feb. 23rd, 1960

Mrs. Alice J. Duck Clerk of Circuit Court Bay Minette, Ala.

Dear Miss. Alice:

Enclosed you will find suit. Would you please hold this and not file it until I notify you.

Sincerely,

John V. Duck

JVD:oq Encl: Buit

SUMMONS AND COMPLAINT OU 2	Moore Ptg. Co.
The State of Alabama, Circuit Court, I	Saldwin County
	TERM, 19
TO ANY SHERIFF OF THE STATE OF ALABAMA:	
You Are Hereby Commanded to SummonJOHN AND MARGARET S	IMS, Jointly and
Individually	
	en e
to appear and plead, answer or demur, within thirty days from the service her the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, again MARGARET SIMS, jointly and individually MRS. W. F. GILMORE, Individually and d/b/a F	ast JOHN AND Defendant
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, again MARGARET SIMS, jointly and individually	ast JOHN AND Defendant
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, again MARGARET SIMS, jointly and individually MRS. W. F. GLIMORE, Individually and d/b/a F	AIRWOOD GROCERY

No. 4195 Page	Defendant lives at
The State of Alabama Baldwin County	Gayfer St. Falrhope, Ala.
CIRCUIT COURT	Received In Office
MRS. W. F. GILMORE, Johnson	2-29 1960
GROCERY Plaintiffs vs.	I have executed this summons this 4-13 1960 by leaving a copy with
JOHN AND MARGARET SIMS, Jointly & Ind. Defendants	John Sens margaret Sens
Summons and Complaint	
Plaintiff's Attorney Defendant's Attorney	Sheriff claims Ten Cents per rathe field S. Level TANIOR WILLY SHERIFF BY DENSITY SHERIFF Eddlegle Steadh Deputy Sheriff
	Janhope, Cela