

4195

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

JOHN AND MARGARET SIMS,
Jointly and Individually
Defendants

~~~~~

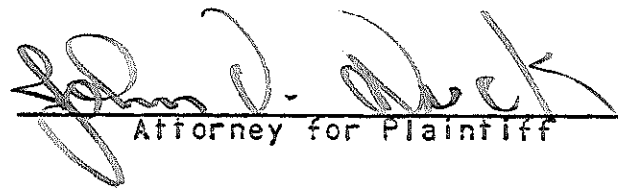
COUNT TWO:

COUNT THREE:


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.

136

now claims the benefit.

  
Attorney for Plaintiff

Defendants reside at :  
Gayfer Street, Fairhope, Ala.



JOHN V. DUCK

ATTORNEY AT LAW  
FAIRHOPE, ALA.

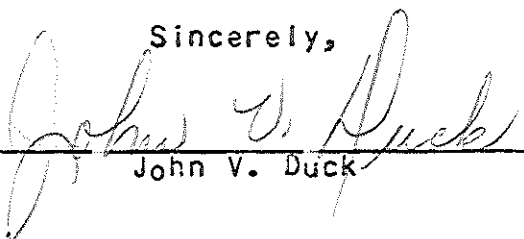
Feb. 23rd, 1960

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:  
suit

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. \_\_\_\_\_

\_\_\_\_\_ TERM, 19\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOHN AND MARGARET SIMS, Jointly and  
Individually

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 JOHN AND  
MARGARET SIMS, jointly and individually, Defendant...

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

\_\_\_\_\_, Plaintiff...

Witness my hand this 29 day of Feb 1960

Reice J. Newick Clerk

No. 4195

Page \_\_\_\_\_

The State of Alabama

Baldwin County

CIRCUIT COURT

MRS. W. F. GILMORE, Jointly

and Ind. and d/b/a FAIRWOOD  
GROCERY

Plaintiffs

vs.

JOHN AND MARGARET SIMS,

Jointly & Ind.

Defendants

Summons and Complaint

FILED

Filed \_\_\_\_\_ 19\_\_

FEB 29 1960

ALMA J. DUCK, CLERK  
REGISTER

Clerk

*W. F. Gilmore*

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Gayfer St. Fairhope, Ala.

Received In Office

2-29 1960

\_\_\_\_\_, Sheriff

I have executed this summons

this 4-13 1960

by leaving a copy with

*John Sims*  
*Margaret Sims*

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

*Taylor Wilkins* Sheriff

*Edleigh Stead* Deputy Sheriff

*Fairhope, Ala*