

4288

COMPLAINT

J. A. PILGRIM

PLAINTIFF

VS.

HARVEY N. CRUMPTON

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

I

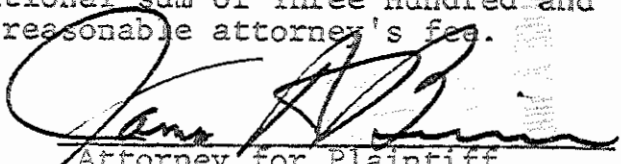
The plaintiff claims of the defendant the sum of One Thousand Five Hundred and No/100 (\$1,500.00) Dollars, due by promissory note made by the defendant on the 12th day of December, 1958, and payable on the 1st day of June, 1959, with interest from maturity, at the rate of Seven (7%) per cent per annum.

II

The plaintiff claims of the defendant the sum of One Thousand Five Hundred and No/100 (\$1,500.00) Dollars, due by promissory note made by the defendant on the 12th day of December, 1958, and payable on the 1st day of June, 1959, with interest from maturity, at the rate of Seven (7%) per cent per annum.

Plaintiff avers that in and by the terms of said note the defendant waived all right to exemption under the Constitution and laws of the State of Alabama, and of this waiver plaintiff now claims benefit.

Plaintiff further avers that in and by the terms of said note, the defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure said note, including a reasonable attorney's fee, and the plaintiff further claims of the defendant the further and additional sum of Three Hundred and No/100 (\$300.00) Dollars, as such reasonable attorney's fee.


Attorney for Plaintiff

The defendant, Harvey N. Crumpton,
resides at Heflin, Cleburne County, Alabama.

FILED

JUN 17 1960

ALICE J. DUCK, Clerk

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 Harvey N. Crumpton

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-----

Harvey N. Crumpton-----, Defendant-----

by J. A. Pilgrim-----

-----, Plaintiff-----

Witness my hand this 17 day of June 1960

Oliver J. [Signature]-----, Clerk

No. 4288

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

J. A. Pilgrim

Plaintiffs

vs.

Harvey N. Crumpton

Defendants

Summons and Complaint

FILED

Filed _____ 19____

JUN 17 1960

ALICE J. DICK

CLERK
REGISTER

Clerk

James A. Brice

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

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

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-----, Defendant-----

by-----

J. A. Pilgrim

-----, Plaintiff-----

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17

day of

June 1960

W. J. Crumpton-----, Clerk

No. 4288

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Plaintiffs

vs.

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Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

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Deputy Sheriff

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PLAINTIFF

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DEFENDANT

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Attorney for Plaintiff

The defendant, Harvey N. Crumpton,
resides at Heflin, Cleburne County, Alabama.

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

POST OFFICE BOX 298

June 13, 1960

WHITEHALL 3-3601

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Dear Mrs. Duck:

I am enclosing summons and complaint for J. A. Pilgrim against Elsa Mueller.

Mrs. Mueller operates a business at Pirate's Cove and may be served there.

Very truly yours,


James A. Brice

JAB:lgs

Encl. 1