COMPLAINT



J. A. PILGRIM

PLAINTIFF

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

VS.

HARVEY N. CRUMPTON

DEFENDANT

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.

INN 1271800.

ALICE J. DUCK, Clerk

The State of Alabama, (Circuit Court, Baldwin C	County
Baldwin County. No	TERM, 19
TO ANY SHERIFF OF THE STATE OF ALABAMA:	
You Are Hereby Commanded to Summon Harvey N. Crumpton	<u> </u>
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to appear and plead, answer or demur, within thirty days from the service hereof, to the the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against	complaint filed in
the Circuit Court of Baidwin County, State of Alabama, at Bay Millette, against	
Harvey N. Crumpton	
	, Defendant
Harvey N. Crumpton	, Defendant

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The State of Alabama, (Circuit Court, Baldwin Co	ounty
Baldwin County.	TERM, 19
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to appear and plead, answer or demur, within thirty days from the service hereof, to the co	
Harvey N. Crumpton	, Defendant
by	
	, Plaintiff
Witness my hand this 17 day of Inne 1960	

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James A. Brice Plaintiff's Attorney		· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·		Sheriff	
Defendant's Attorney		: - -	. <u></u>			_ Deputy Sheriff	
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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.

JAB: lgs

Encl. 1