

SUMMONS AND COMPLAINT

The State of Alabama, {

Baldwin County. {

No. _____

CIRCUIT COURT.

Term, 191_____

To any Sheriff of the State of Alabama:

You are hereby commanded to summon _____

A BIRGANOWSKI _____

to appear at the next term of the Circuit Court to be held for said County at the place of holding the same, then and there to answer the complaint of _____

PEOPLES FERTILIZER COMPANY a CORPORATION _____

Witness my hand, this _____

day of _____

1917

Clerk

COMPLAINT

PEOPLE'S FERTILIZER COMPANY
A CORPORATION

Plaintiffs

vs,

A BIRGANOWSKI _____

Defendants

The plaintiff claim of the Defendant

One Hundred and Forty Five & 26/100ths _____ Dollars, due
due by promissory note made by defendant to plaintiff on Feby. 11th.
1915, ~~with interest~~ due and payable on or before Nov. 1st. 1915
at Baldwin County Bank with interest from Maturity.

The plaintiff further claims of defendant the further sum of Eighty Four
& 50/100ths Dollars due by promissory note made by defendant to plain-
tiff on Feby, 24th. 1915 and due and payable at Baldwin County Bank
on or before Nov. 1st. 1915 with interest from maturity.

Plaintiff further claims of defendant the further sum of Twenty Seven
& 62/100ths Dollars as a reasonable attorneys fee which defendant agreed
to pay in above two notes, and plaintiff alleges that defendant waived
his exemptions as to personal property as to the payment of the two
above notes.

Plaintiffs Attorney S

1917

ORIGINAL.

No.

The State of Alabama,
Baldwin County.

CIRCUIT COURT.

PEOPLES FERTILIZER COMPANY

vs. Plaintiffs.

A BIEGANOWSKI

Defendants.

SUMMONS AND COMPLAINT.

Filed 9/17 1917

J. R. Picum Clerk.

Defendant lives at

Plaintiff's Attorney.

Defendant's Attorney.

THE BALDWIN TIMES PRINT

Received in office

Sept 17 1917
C. E. Cubanko Sheriff

I have executed this Writ

this Oct 15 1917
by leaving a copy of the within sum-
mons and complaint with

A Bieganowski

C. E. Cubanko Sheriff

Deputy Sheriff