

Holey Fertilizer Company,
a corporation,

Plaintiff,

Vs.

J.J.Middleton and A.J.Middleton,
Defendants.

Circuit Court of

Baldwin County, Ala.

Fall Term 1918.

COMPLAINT.

1. The Plaintiff claims of the defendants forty-one & 50/100 Dollars due by promissory note made by them on the 17th, day of February, 1914, and payable to Plaintiff on the 1st, day of November 1914, which sum of money with the interest thereon is still unpaid.
2. Plaintiff claims of the defendants Ninety-five & 50/100 Dollars due by promissory note made by them on the 24th, day of March 1914, and payable to Plaintiff on the 1st, day of November 1914, which sum of money with the interest thereon is still unpaid.

And plaintiff avers that in each of said notes and as a part of the consideration thereof, the defendants expressly waived in writing all of their right to exemptions under the Constitution and laws of the State of Alabama, and of the United States, and agreed to pay an attorney's fee of 10% for collecting or securing same if not paid when due; and plaintiff hereby claims the sum of Twenty-six & 85/100 Dollars as such attorney's fees.

Chas Hall
Gordon Edington

Attorneys for Plaintiff.

The State of Alabama
Baldwin County

No.

Circuit Court

Fall Term, 1918

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon J. J. Middleton and A. J. Middleton,

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Cir-

cuit Court of Baldwin County, State of Alabama, at Bay Minette, against them

the Defendant by Foley Fertilizer Company, a Corporation,

Plaintiff

Witness my hand this 10th day of October 1918

J. W. Richardson
Clerk.

Complaint

Plaintiff Versus

The plaintiff claims of the defendant

Dollars due by

Plaintiff's Attorney.

RECORDED

No.

State of Alabama
Baldwin County

CIRCUIT COURT

Foley Fertilizer Co., a
Corporation.
vs. Plaintiffs

J.J. Middleton and A.J.
Middleton.
Defendants

Summons and Complaint

Filed October 10th 1918

Clerk.

Defendant lives at

Daphne, Ala.

Chas. Hall, Gordon and Edgington.
Plaintiff's Attorney

Defendant's Attorney

Times Print—Bay Minette.

Received in office

October 10th, 1918

Sheriff

I have executed this Writ

this

1918

by leaving a copy of the within summons and complaint with

J.J. Middleton and
A.J. Middleton

Sheriff.

Deputy Sheriff.

\$ 95.00

Foley, Ala., 5/24

1914

On or before Nov 1st 1914

I or we, promise to pay THE FOLEY FERTILIZER CO., or order
Twenty five and 50/100 Dollars for value received, negotiable and
payable at Foley, for Bags OLD BALDWIN GUANO, for Bags FOLEY FAVORITE
GUANO, for LIVE OAK GUANO 90 bags GUANO.

And to secure the payment of this note and any other sum I or we may owe the payee before this note is paid. I or we mortgage to said payee unim-
cumbered property as follows:

- one Pond more age 8 yrs old - named Molly
- 2 cows with calves - one red headed white & one Jersey
- Four cows, one red head & yellow & white, two black
& one deep red, & four calves

My or our entire crops of Cotton, Corn, Potatoes and Farm Products, and all rents accruing to me or us for the year 1914 and each succeeding
year in the County in which I or we now reside or which I or we may hereafter reside in, until paid, and empower said payee or his endorsee to take
possession of and sell the same whenever he deems himself insecure, by posting a notice of the place and terms of sale at the Foley Post Office, and I
or we hereby waive all exemptions under the laws of the State of Alabama and the United States and agree to pay ten per cent. attorney fees, for
collecting or securing same if not paid when due.

WITNESS:

M B D ewey

957

A J Middleton
J J Middleton

Principal \$ 90.00
 Int to Nov 21/98 30.56
 Attys fee 12.10
 (Total) \$ 138.66

J. L. Middleton - Adm'r
 getting pay for same cash
 as balance on this note,
 July 12/10. C.H.

THE STATE OF ALABAMA, } Office of the Judge of
 BALDWIN COUNTY. } the Probate Court.

I, J. H. H. SMITH, Judge of said Court in and for
 said County, do hereby certify that the within instru-

ment was filed in this office for record on the 6th

day of May, 1914, at

o'clock, and I further certify that the

same is duly recorded in Record Book No. 137 mtg

Page 180 and duly examined

Witness my hand this 8th day of

May, 1914

J. H. H. Smith Judge of Probate Court

By L.

STATE OF ALABAMA,
 Baldwin County.

I, J. H. H. Smith, Judge of
 Probate for said county, hereby certify that the following
 privilege tax has been paid on the within instrument as re-

quired by Acts 1902 & 1903 of \$ 15

J. H. H. Smith Judge of Probate

By J. H. H. Smith

\$ 41.50

Foley, Ala.,

2/17

191 4

On or before Nov 1st

191 4

I or we, promise to pay THE FOLEY FERTILIZER CO., or order

Forty one and 50/100

Dollars for value received, negotiable and

payable at Foley, for

Bags ~~OLD BALDWIN~~ GUANO, for

Bags FOLEY FAVORITE

GUANO, for LIVE OAK GUANO

bags 2200th

GUANO.

And to secure the payment of this note and any other sum I or we may owe the payee before this note is paid. I or we mortgage to said payee unim-
cumbered property as follows:

My or our entire crops of Cotton, Corn, Potatoes and Farm Products, and all rents accruing to me or us for the year 191 4 and each succeeding
year in the County in which I or we now reside or which I or we may hereafter reside in, until paid, and empower said payee or his endorsee to take
possession of and sell the same whenever he deems himself insecure, by posting a notice of the place and terms of sale at the Foley Post Office, and I
or we hereby waive all exemptions under the laws of the State of Alabama and the United States and agree to pay ten per cent. attorney fees, for
collecting or securing same if not paid when due.

WITNESS:

M. B. Deway

J. H. 1

J. H. Middleton
A. J. Middleton

462 m