

GIRARD LUCASSEN, Ind. and d/b/a  
LUCASSEN PLUMBING COMPANY

Plaintiff

-VS-

HENRY WITHERINGTON

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

4666

COUNT ONE:

Plaintiff claims of the Defendant the sum of two-hundred fifty-seven (\$257.00) dollars, due from him by account on the 15th day of January, 1960, which sum of money with the interest thereon is still unpaid.

COUNT TWO:

Plaintiff claims of the Defendant the sum of two-hundred fifty-seven (\$257.00) dollars, for work and labor done for the Defendant by the Plaintiff on the 12th day of January, 1960 at his request, which sum of money with the interest thereon is still unpaid.

  
Attorney for Plaintiff

Defendant may be served at  
Daphne, Alabama, approximately  
1/4 mile East of Daphne White  
Elementary School.

FILED

APR 3 1961

ALICE J. DUCK, CLERK  
REGISTER

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 HENRY WITHERINGTON

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 HENRY WITHERINGTON

-----, Defendant---

by GIRARD LUCASSEN, Ind., d/b/a LUCASSEN PLUMBING COMPANY

-----, Plaintiff---

Witness my hand this 3 day of Apr 1961

Reinhold Clerk

No. 4666

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The State of Alabama  
Baldwin County

CIRCUIT COURT

GIRARD LUCASSEN, Ind., d/b/a

LUCASSEN PLUMBING COMPANY

Plaintiffs

vs.

HENRY WITHERINGTON

Defendants

Summons and Complaint

Filed

FILED

19

APR 3 1961

Clerk

JUDGE J. DICK, CLERK  
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Daphne, Alabama, may be served  
at approximately 1/4 Mile East  
of White Junior High School

Received In Office

4/3 1961

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

I have executed this summons

this 4 April 1961

by leaving a copy with

Henry Witherington

Sheriff claims

10 miles at

Ten Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY

W. O. Garner  
DEPUTY SHERIFF

Sheriff

Deputy Sheriff

Daphne

\$ 1424.27      Loxley      Alabama      March 12 1959  
City or Town      State      Date

For Value Received, the undersigned jointly and severally promise to pay to the Order of Jacob Van Kamphuis the sum of One thousand four hundred twenty four <sup>and</sup> 27/100 Dollars  
in 23 equal consecutive monthly installments of 59.34 Dollars each, the first installment  
being payable on the 25 day of April, 1959, all remaining installments being pay-  
able on the same date of each succeeding month thereafter, the final payment of \$ 59.45 falling due on the 25  
day of March, 1961, with interest on each installment after maturity at the highest legal rate. All install-  
ments are payable at such place as the legal holder hereof may from time to time appoint.

In case default be made in payment of any installment at its maturity, all remaining installments shall, at the option of  
the legal holder hereof, become immediately due and payable. Makers, indorsers and guarantors hereby waive notice of nonpay-  
ment, presentment, protest, notice of protest and demand. In the event this note is not paid according to its terms and is placed  
with an attorney for collection, the undersigned agrees to pay reasonable attorney's fees, subject to any limitation of the govern-  
ing laws.

By Paul Childers  
Buyer

4666

FOR VALUE RECEIVED, the undersigned indorsers, jointly and severally guarantee payment of the within note, waiving demand of payment, protest, notice of nonpayment and diligence, and agree that the time of payment may be extended without affecting their liability.

*Paul C. Hildner*  
*Jacob Van Hump*

