

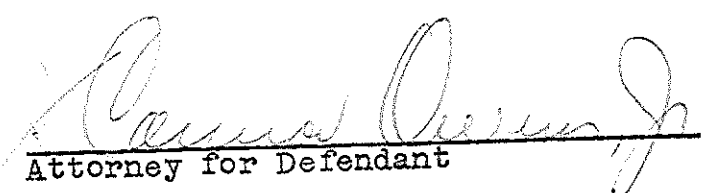
J.L. THOMAS,
Plaintiff,
vs.
CLEVE HYATT,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN LAW NO. 4669

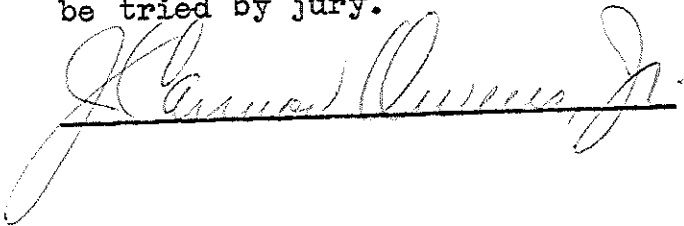
ANSWER

Now comes the Defendant, by his attorney, and for answer to the Bill of Complaint filed in this cause says as follows:

1. Not guilty.
2. For further answer to the said Bill of Complaint, the Defendant alleges that he has paid the debt for which the recovery of which this suit was brought, before the action was commenced.


Attorney for Defendant

Defendant demands that this cause
be tried by jury.


Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN LAW NO. 4662.

J.L. THOMAS,

Plaintiff,

vs.

CLEVE HYATT,

Defendant.

ANSWER

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

Dahiberg Building

BAY MINETTE, ALABAMA

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon CLEVE HYATT 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, Alabama, at the place of holding same by J. L. THOMAS.

Witness my hand this the 4th day of April, 1961.


Clerk

* * * * *

COMPLAINT

J.L. THOMAS,)	
PLAINTIFF)	IN THE CIRCUIT COURT OF
)	
VS:)	BALDWIN COUNTY, ALABAMA
)	
CLEVE HYATT,)	AT LAW
)	
DEFENDANT)	

The Plaintiff claims of the defendant ONE THOUSAND, FIVE HUNDRED & 00/100 DOLLARS (\$1,500.00), due by promissory note made by him on, to wit: the 6th day of March, 1961, and payable on the 6th day of September, 1961, with interest thereon.

Said note provides that, "In the event of ... judgment against ... the payee may, at its option, declare the amount of indebtedness immediately due and payable, and proceed to collect the same in any lawful manner. No delay shall waive the right to make the same".

Said note provides for a reasonable attorney's fee, which plaintiff alleges to be \$225.00.


Attorney for Plaintiff

The Defendant's address is:

Bay Minette, Alabama

1500
 60
 225
 1785

Received 5 day of April 1961
 and on 13 day of May 1961
 I served a copy of the within on Cleve Hyatt
 on _____
 By service on _____
 TAYLOR WILKINS, Sheriff
 By W. A. Talbert 10 mi

No. 4669
 IN THE CIRCUIT COURT OF
 BALDWIN COUNTY, ALABAMA
 AT LAW
 J. L. THOMAS,
 PLAINTIFF
 VS:
 CLEVE HYATT,
 DEFENDANT

We the jury
 find for the
 Plaintiff and
 set damages at
 \$500.00 and return
 the verdict to the
 Defendant.

FILED
 APR 4 1961
 ALICE L. DUCK, CLERK
 REGISTER

LAW OFFICE OF
 FOREST A. CHRISTIAN
 FOLEY, ALABAMA