

GEORGE T. FOWLER
Plaintiff

-VS-

HARMON M. DESSLER
Defendant

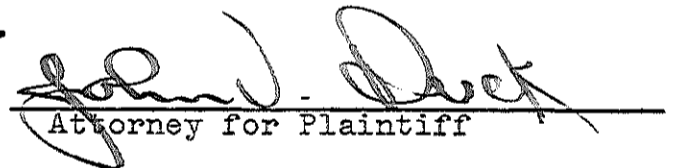
4719
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE:

Plaintiff claims of the Defendant the sum of two-hundred and sixty (\$260.00) dollars, due by promissory note, made by him on the 18th day of August, 1960, and payable on the 19th day of October, 1960, with interest thereon.

Plaintiff further alleges that in, by and as a part of said note, the Defendant agreed to pay all costs of collecting, or securing or attempting to collect or secure this note, including a reasonable attorney's fee, and plaintiff further avers ~~that~~ ^{and} claims of the defendant the further and additional sum of sixty-five (\$65.00) dollars as a reasonable attorney's fee.

Plaintiff further alleges that in, by and as a part of said note, the Defendant waive demand, presentment, protest, notice of protest, and all rights of exemption under the Constitution and Laws of Alabama, as to personal property, and the Plaintiff claims now the benefit of this waiver.


Attorney for Plaintiff

Defendant resides at:
Battles Wharf, Alabama

FILED
JUN 1 1961
ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.

..... TERM, 19....

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Harmon M. Dessler

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 Harmon M. Dessler

....., Defendant.....

by George T. Fowler

....., Plaintiff.....

Witness my hand this 1st day of June, 1961

Exp. 6-7-61

Alice J. Duck Clerk

No. 4219

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

George T. Fowler

Plaintiffs

vs.

Harmon M. Dessler

Defendants

Summons and Complaint

Filed

FILED

19

JUN 1 1961

ALICE J. DUCK, Clerk

Clerk

John V. Duck

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

May be served at:

Battles Wharf, Alabama

Received In Office

June 1, 1961

Sheriff.

I have executed this summons

this

7 June

1961

by leaving a copy with

Harmon M. Dessler

Sheriff claims

75

miles at

Ten Cents per mile Total \$

7.50

TAYLOR WILKINS, Sheriff

BY

Garner

DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

W. O. Garner

Deputy Sheriff.

Battles wharf

GEORGE T. FOWLER, (IN THE CIRCUIT COURT OF
Plaintiff, (BALDWIN COUNTY, ALABAMA
VS (AT LAW
HARMON M. DESSLER, (NO: 4719
Defendant. (

ONE

The Defendant, as a defense to the action of the Plaintiff, saith that, at the time said action was commenced, the Plaintiff was indebted to him in the sum of \$485.00, on open account due on the first day of January, 1961, which sum of money, with the interest thereon, is still unpaid, and which he hereby offers to set off against the demand of the Plaintiff, and he claims judgment for the excess.

TWO

The Defendant, as a defense to the action of the Plaintiff, saith that, at the time said action was commenced, the Plaintiff was indebted to him in the following sums, to-wit:

\$200.00 for work and labor done in, to-wit, July, 1960
\$110.00 for a watch sold to Plaintiff by Defendant in 1960
\$100.00 for rent in, to-wit, July and August, 1960
\$ 75.00 under a contract for a share of the gross income realized by Plaintiff in a joint venture with Defendant

which above sums the Defendant hereby offers to set off against the demand of the Plaintiff, and he claims judgment for the excess.

Keener T. Blackmarr
Attorney for Defendant

Defendant demands a trial by jury.

Keener T. Blackmarr
Attorney for Defendant

Keener T. Blackmarr
951 Government Street Building
Mobile, Alabama

FILED
JUN 28 1961
ALICE J. DUCK, CLERK
REGISTER