

JOYCE JEWELRY CO., a  
corporation,

Plaintiff,

-vs-

S. B. KNIGHT,

Defendant.

\* IN THE CIRCUIT COURT OF

\* BALDWIN COUNTY, ALABAMA


\* AT LAW

\*

NO.

14728

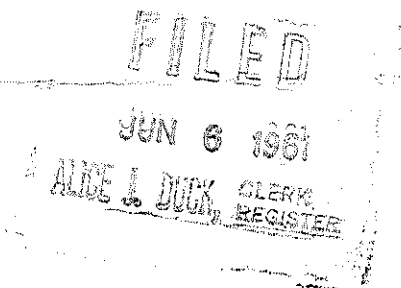
Plaintiff claims of Defendant TWO HUNDRED NINETEEN & 60/100 (\$219.60) DOLLARS due under terms of a written contract executed by defendant on to-wit: December 10, 1960, under terms of which Defendant waived all right to exemption under the constitution and laws of Alabama and agreed to pay a reasonable attorney's fee in the event of default which fee plaintiff claims in the amount of SEVENTY THREE & 20/100 (\$73.20) DOLLARS. Plaintiff avers that said defendant breached said contract by failure to pay as agreed and under the terms of same plaintiff declares all future payments due and payable, wherefore plaintiff sues.

  
MAYER W. PERLOFF  
Attorney for Plaintiff

Defendant may be served:

Home: Box 551  
Foley, Alabama

Emp: Van Lierop and Van Lierop  
Foley, Alabama



SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4728

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

S. B. Knight

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

S. B. Knight

Defendant

by

Joyce Jewelry Co. a corp

Plaintiff

Witness my hand this

6

day of

June

1961

Reice J. Duck

Clerk

No. 4724 Page \_\_\_\_\_

The State of Alabama

Baldwin County

CIRCUIT COURT

Joyce Jewelry Co  
Plaintiffs

vs.

S. B. Knight  
Defendants

Summons and Complaint

Filed 6-6 1961

W. J. Luck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

June 6 1961  
\_\_\_\_\_, Sheriff

I have executed this summons

this 6/17 1961

by leaving a copy with

S. B. Knight

Sheriff claims 22 miles at

Ten Cents per mile Total \$ 2.20  
TAYLOR WILKINS, Sheriff

BY Childress  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Childress Deputy Sheriff

July

MAYER W. PERLOFF  
ATTORNEY AT LAW  
SUITE 605 VAN ANTWERP BUILDING  
MOBILE 12, ALABAMA  
HEMLOCK 3-5412

June 5, 1961.

Mrs. Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Bay Minette, Alabama

Re: Joyce Jewelers -v- KNIGHT, S. B.

Dear Mrs. Duck:

Would you please file the attached Bill of Complaint in your court and advise me when service has been had.

Thank you for your attention in this matter.

Very truly yours,

  
MAYER W. PERLOFF

M  
W  
P  
/rms

Enc/1