

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mack Fountain to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of John Fountain.

Witness my hand this 8 day of February, 1962.

Ex 2-9-62

Alvin J. Duck  
Clerk

JOHN FOUNTAIN,

I

Plaintiff,

I

IN THE CIRCUIT COURT OF

vs.

I

BALDWIN COUNTY, ALABAMA

MACK FOUNTAIN,

I

LAW SIDE

Defendant.

I

COUNT ONE:

The Plaintiff claims of the Defendant One Hundred Eighty-one Dollars and Sixty Cents (\$181.60) due by Promissory Note made by him on the 16th day of December, 1955, and payable on the 31st day of December, 1955, with interest thereon, which sum of money is still unpaid.

The Plaintiff avers 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 such debt, including a reasonable attorneys fee, whether the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant the further and additional sum of Fifty Dollars (\$50.00) as such reasonable attorney's fee.

The Plaintiff further avers that in, by and as a part of said note the Defendant waived as to this debt or any renewal thereof, all rights to exemption under the Constitution and Laws

of Alabama as to personal property and of this waiver the Plaintiff  
now claims the benefit.

CHASON & STONE

By:

John Earle Chason

Defendant resides at Lillian,  
Alabama

FILED

FEB 8 1912

ALICE J. DUCK, CLERK  
REGISTER

no. 5044

JOHN FOUNTAIN,  
Plaintiff,

vs.

MACK FOUNTAIN,  
Defendant.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE

\* \* \* \* \*

SUMMONS AND COMPLAINT

\* \* \* \* \*

FILED  
FEB 10 1962  
ALICE J. DICK, CLERK

CHASON & STONE  
ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA

Received 8 day of Feb 1962  
and on 9 day of Feb 1962  
I served a copy of the within doc  
on Mack Fountain  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. A. Talbot D. S.  
o m