

MRS. HATTIE LOWELL WATSON,)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY, ALABAMA
VS)	
V. M. LOWELL AND RAMONA LOWELL)		AT LAW
Individually and Jointly,)	
Defendants)	

5129

COUNT ONE:

Plaintiff claims of the defendant the sum of FOUR HUNDRED TWENTY and no/100 (\$420.00) DOLLARS, due by promissory note made by them on the 29th day of March, 1962, with interest thereon.

That in and by the terms of said note, defendants waived all rights, exemptions under the constitution and laws of the State of Alabama as to personal property, and the plaintiff claims benefit of said waiver. That in and by the terms of said note, the defendants promise to pay all costs of collection or securing or attempting to collect or secure this note, including a reasonable attorney's fee, and the plaintiff claims further and additional sum of ONE HUNDRED AND TEN (\$110.00) DOLLARS, as a reasonable attorney's fee.

John V. Duck
Attorney for Plaintiff

Defendants may be served
in Loxley, Alabama



SUMMONS AND COMPLAINT

Baldwin Times

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 V. M. LOWELL AND RAMONA LOWELL, individual
and jointly

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 V. M. LOWELL AND
RAMONA LOWELL, INDIVIDUALLY AND JOINTLY, Defendant.

by

Hattie Lowell Watson

Plaintiff

Witness my hand this

2

day of

May

1962

Ex-5-10-62

Alice J. Black, Clerk

No. 5129

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THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

HATTIE LOWELL WATSON

vs.

Plaintiffs

V. M. LOWELL AND RAMONA LOWELL

Defendants

SUMMONS and COMPLAINT

Filed

FILED

, 19

MAY 2 1962

ALICE J. DUCK, CLERK
REGISTER

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Loxley, Alabama

RECEIVED IN OFFICE

5-2, 1962

Sheriff

I have executed this summons

this 10 May, 1962

by leaving a copy with

V. M. Lowell
Ramona Lowell

Sheriff claims 80 miles at

Ten Cents per mile Total \$ 8.00

TAYLOR WILKINS, Sheriff

BY

W. C. Lamm
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. C. Lamm Deputy Sheriff

Loxley

MRS. HATTIE LOWELL WATSON,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

Vs.

X

BALDWIN COUNTY, ALABAMA

V. M. LOWELL AND RAMONA
LOWELL, Individually and
Jointly,

X

AT LAW

X

CASE NO. 5129

Defendants.

X

For answer to the Plaintiff's complaint, the Defendants
say:

1.

Not guilty.

2.

Do not owe the amount sued for, nor any amount.

WILTERS & BRANTLEY

BY:

Sallie M Brantley
Attorney for the Defendants -
V. M. Lowell and Ramona Lowell

The Defendants demand a trial by jury.

WILTERS & BRANTLEY

BY:

Sallie M Brantley

FILED

MAY 29 1962

ALICE L. DUCK, CLERK
REGISTER