SECURITIES CREDIT COMPANY, INC. A Corporation

Plaintiff

-VS-

 $_{\slash\hspace{-0.4em} \gamma}$  IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW:

HAROLD W. PAYNE and BEULAH L. PAYNE [ Jointly and Severally,

Defendants



## COUNT ONE:

Plaintiff claims of the Defendant the sum of TWO HUNDRED AND FIFTY NINE AND 16/100 DOLLARS (\$259.16), due by promissory note made by them on the 9th day of March, 1962, and payable in monthly installments of ELEVEN AND 78/100 DOLLARS (\$11.78) beginning on the 15th day of April, 1962, with interest thereon.

In and by the terms of said note, the Plaintiff hereof had the option to declare the whole balance of said note due on any default by said Defendants.

Plaintiff further avers that in, by and as a part of said note, the Defendants agreed to pay all costs of collecting or securing or attempting to secure or collect such debt including a reasonable attorney's fee, whether the same be collected or secured by suit or otherwise, and the Plaintiff further claims of the Defendants the further and additional sum of FORTY DOLLARS (\$40.00) as a reasonable attorney's fee.

Plaintiff further avers that in, by and as a part of said note, the Defendants waived as to this debt or any renewal thereof, all rights of exemptions under the Constitution and Laws of Alabama, as to personal property, and of this waiver the Plaintiff now claims the benefit.

And the second of the second

Defendants may be served at 523 Gayfer Street Fairhope, Alabama



660

The State of Alabama,  Baldwin County.	Circuit Court, Baldwin County
	TERM, 19
TO ANY SHERIFF OF THE S	TATE OF ALABAMA
You Are Commanded to Summon _	HAROLD W. PAYNE and BEULAH L. PAYNE, Jointly
and Severally	
to appear and plead, answer or demute the Circuit Court of Baldwin County,  and BEULAH L. PAYN	State of Alabama, at Bay Minette, against HAROLD W. PAYNE  E, Jointly and Severally  Defendant
	day of Oct 1962
6X-10-H-62	Deice J. Duch, Clerk

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STATE of ALABAMA  Baldwin County	Defendant lives at 523 Gayfer Street Fairhope, Alabama
CIRCUIT COURT	Received In Office
SECURITIES CREDIT COMPANY, INC. A Corporation	10/3,1962
Plaintiffs vs.	Sheriff.  I have executed this summons  this 4 day for 19
HAROLD W. PAYNE and BEULAH L.  Jointly and Severally PAYNE	by leaving a copy with
Defendants	throld W. Payne
Summons and Complaint	Denla J. Payne
Filed	
The state of the s	Sheriff claims / 40
Market Transaction Control of Con	Ten Cents per mile, Total \$ / O  FATEOR WILKINS, Sheriff  BY  DEPUTY SHERIFF
Plaintiff's Attorney	Taylor Wilking
Defendant's Attorney	Sheriff.
	These I Deputy Sheriff.