

CARBIDE EMPLOYEES' FEDERAL
CREDIT UNION, A Corporation,

Plaintiff,

-VS-

R. L. EZELL,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant FOUR HUNDRED SEVENTY-EIGHT AND NO/100 (\$478.00) DOLLARS due by promissory note made by him on, to-wit, the 10th day of December, 1959, and payable in monthly installments of FIFTY DOLLARS (\$50.00) each, first payment to be made on the 31st day of December, 1959, and a like amount due on the same day every month thereafter until the full amount has been paid, with the interest thereon.

And the Plaintiff avers that in said note and as part of the consideration thereof, the Defendant agreed to pay an attorney's fee for the collection thereof and the Plaintiff hereby claims the further sum of ONE HUNDRED AND NO/100 (\$100.00) Dollars as such attorneys' fee.

COUNT II.

The Plaintiff claims of the Defendant the sum of EIGHTY-THREE AND NO/100 (\$83.00) DOLLARS due by promissory note made by him on, to-wit, the 22nd day of October, 1959, and payable in twelve monthly installments of TEN AND NO/100 (\$10.00) Dollars each, first payment of which is payable on the 30th day of November, 1959, and a like amount every month until the full amount has been paid, with the interest thereon.

And the Plaintiff avers that in said note and as part of the consideration thereof, the Defendant agreed to pay an attorney's fee for the collection thereof and the Plaintiff hereby claims the further sum of TWENTY-FIVE AND NO/100 (\$25.00) Dollars as such attorney's fee.


E. G. RICKABY, Attorney for
Plaintiff.

Defendant's Address is:
c/o Joe E. McKinzie,
161 Ettele Street
Fairhope, Alabama.

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 R. L. EZELL

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 R. L. EZELL

....., Defendant

by CARBIDE EMPLOYEES' FEDERAL CREDIT UNION, A Corporation

....., Plaintiff

Witness my hand this 17 day of Aug 1961

Ex 8-31-61

Theresa Duck, Clerk

No. 482-D

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

CARBIDE EMPLOYEES' FEDERAL
CREDIT UNION, A Corporation,

Plaintiffs

vs.

R. L. EZEIL,

Defendants

Summons and Complaint

FILED

Filed _____ 19__

AUG 17 1961

**ALICE J. DUCK, CLERK
REGISTER**

Clerk

E. G. RICKARBY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

c/o Joe E. McKinzie
161 Ette Street
Fairhope, Alabama

Received In Office

8/17, 1961

Sheriff.

I have executed this summons

this August 31st 1961

by leaving a copy with

R. L. Ezell

Sheriff claims 10 miles at

Ten Cents per mile Total \$ 1.00
TAYLOR WILKINS, Sheriff

BY W. D. Garner
DEPUTY SHERIFF

Taylor Wilkins
Sheriff.

W. D. Garner
Deputy Sheriff.

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

August 15, 1961

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama.

Dear Mrs. Duck:

Enclosed find Summons and Complaint in the case of
Carbide Employees' Federal Credit Union versus
E. L. Ezell.

Please process and oblige.

Yours very truly,



EGR/ts

Encl.

cc: Mr. Gordon Bennett