

TERMPLAN INCORPORATED, a  
Corporation,

Plaintiff,

vs.

INEZ D. DALE and JOHN L.  
DALE, JR., jointly and  
individually,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 1996.

Plaintiff claims of the Defendant ONE THOUSAND FIVE HUNDRED ONE and 82/100 (\$1,501.82) DOLLARS due by promissory note made by them on July 13th, 1961, and payable in 24 installments of \$68.00 each, beginning on August 1st, 1961. Said note contains the provision that upon the failure to pay any installment of said note, the holder may without demand or notice, mature all remaining installments, and Plaintiff alleges that no payments have been made upon said note.

Plaintiff further alleges that in and by the provisions of said note, the Defendants waived all rights of exemption under the Constitution of the State of Alabama, and Plaintiff claims the right of said waiver.

Plaintiff further alleges that the Defendants agreed to pay a reasonable attorney's fee in the event that said note was placed into the hands of an attorney for collection, and Plaintiff claims the further and additional sum of \$225.00 as a reasonable attorney's fee in the premises.

FILED

JAN 16 1962

ALICE L. DUCK, CLERK  
REGISTER

*Robert Owens, Jr.*  
Attorney for Plaintiff

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW NO. 4996.  
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TERMPLAN INCORPORATED, a  
Corporation,

Plaintiff,

vs. \

INEZ D. DALE and JOHN L. DALE,  
JR., jointly and individually,  
Rt 1 Box 25 Wapine  
Defendants.

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SUMMONS AND COMPLAINT

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Sheriff claims 108 miles at  
Ten Cents per mile Total \$ 10.80  
TAYLOR WILKINS, Sheriff  
BY Taylor  
DEPUTY SHERIFF

Received 16 day of Jan 1962  
and on 13 day of Sept 1962  
I served a copy of the within on Inez D. Dale and  
John L. Dale Jr  
By service on Taylor

TAYLOR WILKINS, Sheriff  
By W.O. Hammond, S.  
Wapine

FILED

JAN. 8 1962

ALICE L. DUCK, CLERK  
REGISTER

J. CONNOR OWENS, JR.  
ATTORNEY AT LAW  
Dahlberg Building  
BAY MINETTE, ALABAMA

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4996

JANUARY

TERM, 1962

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon John L. Dale, Jr. and Inez D. Dale

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

INEZ D. DALE and JOHN L. DALE, JR., Defendants

by

TERMPIAN INCORPORATED, a Corporation, Plaintiff

Witness my hand this 16 day of January 1962

Alice J. Duck, Clerk

Est-1-23-62  
Defendants reside at Route 1, Box 25, Daphne, Alabama

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

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

vs.

Plaintiffs

Defendants

**SUMMONS and COMPLAINT**

Filed \_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

\_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this \_\_\_\_\_, 19\_\_\_\_

by leaving a copy with

\_\_\_\_\_, Sheriff

\_\_\_\_\_, Deputy Sheriff