

STATEMENT

LAW OFFICE OF  
JAMES A. BRICE

FOLEY, ALABAMA  
September 23, 1963

Mrs. Alice J. Duck  
Circuit Clerk  
Bay Minette, Alabama

Enclosures: Summons and Complaint--Farmers & Merchants Bank  
vs  
Thomas C. Conner

"A LAWYER'S TIME AND ADVICE ARE HIS STOCK IN TRADE"  
— A. LINCOLN

5224  
hells

FOREST A. CHRISTIAN  
ATTORNEY AT LAW  
P.O. DRAWER 190  
AREA CODE 205 - PHONE WH 3-2201  
FOLEY, ALABAMA 36535

April 26, 1965

Honorable Telfair Mashburn  
Judge of Circuit Court  
Bay Minette, Alabama

Re: Farmers & Merchants Bank  
Vs: Thomas C. Conner  
#5724 Jury

Dear Judge Mashburn:

The above mentioned case has been settled between  
the parties and you may dismiss.

Cordially yours,

  
FOREST A. CHRISTIAN

FARMERS & MERCHANTS BANK, a State )  
Banking Corporation )

PLAINTIFF )

VS )

THOMAS C. CONNER )

DEFENDANT )

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW - 5724

### COMPLAINT

The Plaintiff claims of the Defendant the sum of Six Hundred Forty-nine and 50/100 Dollars (\$649.50), due by promissory note made by the Defendant on the 15th day of February 1963, and payable on the 25th day of March 1963, with interest from September 1, 1963 at the rate of eight per cent (8%) per annum.

Plaintiff avers that in and by the terms of said note the Defendant waived all right to exemption on personal property under the constitution and laws of the State of Alabama, and of the waiver Plaintiff now claims benefit.

Plaintiff further avers that in and by the terms of said note, the Defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure said note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of Eight-seven and 50/100 Dollars (\$87.50), as such reasonable attorney's fee.

FILED

SEP 24 1963

ALICE L. DICK, CLERK  
REGISTER

  
Attorney for Plaintiff

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 Thomas C. Conner

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 \_\_\_\_\_

Thomas C. Conner, Defendant

by \_\_\_\_\_

Farmers & Merchants Bank, a state Banking Corporation, Plaintiff

Witness my hand this 24 day of Sept. 1963

67-10-1-63

Alice J. Luck, Clerk

No. 5224

Page \_\_\_\_\_

**STATE of ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

Farmers & Merchants Bank, a

State Banking Corporation

Plaintiffs

vs.

Thomas C. Conner

Gulf Shores, Gulf State

Defendants

**Summons and Complaint**

Filed

**FILED**

19

**SEP 24 1963**

Clerk

**AUDIE J. DUCK, CLERK**

**REGISTER**

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Gulf Shores, Alabama

Received In Office

Sept 24, 1963

Sheriff.

I have executed this summons

this

Oct 1

1963

by leaving a copy with

Thomas C. Conner

Sheriff claims 100 miles at

Ten Cents per mile Total \$ 10.00

**TAYLOR WILKINS, Sheriff**

by C. Childress  
DEPUTY SHERIFF

Taylor Wilkins  
Sheriff.

Carlton C. Childress  
Deputy Sheriff.

Gulf Shores

FARMERS & MERCHANTS BANK, a  
State Banking Corporation,

Plaintiff,

Vs.

THOMAS C. CONNER,

Defendant.

X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

5724

Comes now the Defendant in the above styled cause and for  
answer to the Complainant's Complaint says:

1.

That he is not guilty of the matters alleged therein.

WILTERS & BRANTLEY

BY: 

Attorney for Defendant

Defendant demands a trial by jury.

WILTERS & BRANTLEY

BY: 

Harry J. Wilters, Jr.  
Attorney for Defendant

FILED

OCT 24 1963

ALICE J. DUCK, CLERK  
REGISTER