

SUMMONS

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon JOHN M. DAILEY 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, Alabama, at the place of holding same by FARMERS & MERCHANTS BANK, of Foley, Alabama, an Alabama corporation.

Witness my hand this the 9 day of May, 1963.

Alice J. Duck  
Clerk

\* \* \* \* \*

COMPLAINT

5565

FARMERS & MERCHANTS BANK, of )  
Foley, Alabama, an Alabama )  
corporation, )

IN THE CIRCUIT COURT OF

PLAINTIFF )  
VS: )  
BALDWIN COUNTY, ALABAMA

AT LAW

JOHN M. DAILEY, )

DEFENDANT )

COUNT I:

The Plaintiff claims of the Defendant ONE HUNDRED AND 00/100 (\$100.00) DOLLARS, due by promissory note made by him on the 3rd day of July, 1962, and payable on the 4th day of December, 1962, with interest thereon, in the amount of \$5.00.

Said note provides for a reasonable attorney's fee, which Plaintiff alleges to be TWENTY-FIVE AND 00/100 (\$25.00) DOLLARS.

COUNT II:

The Plaintiff claims of the Defendant ONE HUNDRED THIRTY AND 00/100 (\$130.00) DOLLARS damages for conversion by him on the 4th day of December, 1962 of the following chattels described as:

1950 Model Chevrolet 1/2 ton pickup truck Motor No. GAA-862604,  
the property of the plaintiff.

Melvin Cleary  
Attorney for Plaintiff

The Defendant's address is:  
Silverhill, Alabama

**FILED**

*Ex-5-12-63*

MAY 9 1963

79

ALICE J. DUCK, CLERK  
REGISTER

AFFIDAVIT

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

Before me, the undersigned Notary Public, personally appeared FOREST A. CHRISTIAN, who being duly sworn deposes and says that the property being sued on by FARMERS & MERCHANTS BANK, of Foley, Alabama, an Alabama corporation, Plaintiff, vs. JOHN M. DAILEY, Defendant, to wit:

1950 Model Chevrolet 1/2 ton pickup truck Motor No. GAA-862604, belongs to the Plaintiff.

Forest A. Christian

Forest A. Christian

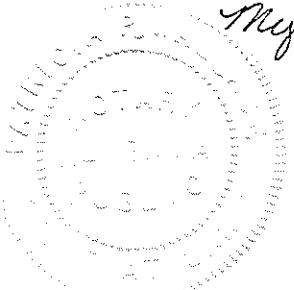
Sworn to and subscribed before  
me this 7th day of May, 1963.

Patricia P. Wallace

Notary Public

Baldwin County, Alabama

My commission expires 9/26/65



Received 9 day of May 1963  
and on 12 day of May 1963  
I served a copy of the within S + C  
on John M. Dailey

By service on

TAYLOR WILKINS, Sheriff

*Taylor Wilkins* D. S.

Sheriff claims 72 miles at

Ten Cents per mile 7.20  
TAYLOR WILKINS, Sheriff

BY Deputy Sheriff

SUMMONS AND COMPLAINT

FARMERS & MERCHANTS BANK, of Foley,  
Alabama, an Alabama corporation,

PLAINTIFF

JOHN M. DAILEY,

DEFENDANT

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA