

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,)

PLAINTIFF)

VS:)

JOHN M. DAILEY,)

DEFENDANT)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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.

Mary Cleary
Attorney for Plaintiff

The Defendant's address is:
Silverhill, Alabama

EX-5-17-63

FILED

MAY 9 1963

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

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



Notary Public

Baldwin County, Alabama

My commission expires 9/26/65



Received 9 day of May 1963
and on 17 day of May 1963
I served a copy of the within 84c
on John M. Dailey

By service on _____

TAYLOR WILKINS, Sheriff
By [Signature] D. S.

[Signature]

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY _____
DEPUTY SHERIFF

70.5565

SUMMONS AND COMPLAINT

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

PLAINTIFF

JOHN M. DAILEY,

DEFENDANT

FILED
MAY 9 1963
MISS. J. DICKS, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA