

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon M. L. BROWN and JUANITA T. BROWN, to appear and answer, plead or demur, within thirty days from the date hereof of this service, to a Bill of Complaint filed against them in Circuit Court, at Law, for said County and said State by MRS. JOHN W. HULING.

Herein fail not. Due return make of this writ as the law directs.

Witness my hand this the 15 day of June, 1963.

*W. L. Smith*  
Clerk of Court

MRS. JOHN W. HULING, )

Plaintiff )

-vs-

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

M. L. BROWN and JUANITA T. )  
BROWN, )

AT LAW

Defendants )

*No. 5614*

COUNT ONE:

Plaintiff claims of Defendants, the sum of \$3,925.00, due by promissory note made by them on, heretofore, to-wit: The 28th day of October, 1961, which sum of money, with interest thereon, is due and unpaid; and Plaintiff avers that in and by the terms of said note, the Defendants waived all rights of exemption under the laws of the State of Alabama, and Plaintiff claims the benefit of said waiver; Plaintiff claims the additional sum of \$780.00 as a reasonable sum as attorney fees for bringing this suit for that the Defendants in and by the terms of said note agreed to pay a reasonable attorney fee, and Plaintiff avers that said amount is a reasonable attorney fee for the bringing and prosecuting of this suit.

COUNT TWO:

Plaintiff claims of Defendants, separately and severally, the sum of \$3,925.00, due by promissory note made by them, on, heretofore, to-wit: The 28th day of October, 1961, which sum of money,

with interest thereon, is due and unpaid; and Plaintiff avers that in and by the terms of said note, the Defendants waived all rights of exemption under the laws of the State of Alabama, and Plaintiff claims the benefit of said waiver; Plaintiff claims the additional sum of \$780.00 as a reasonable sum as attorney fees for bringing this suit for that the Defendants in and by the terms of said note agreed to pay a reasonable attorney fee, and Plaintiff avers that said amount is a reasonable attorney fee for the bringing and prosecuting of this suit.

COUNT THREE:

Plaintiff claims of Defendants the sum of \$1,770.00, due by promissory note made by them on, heretofore, to-wit: The 5th day of July, 1961, which sum of money, with interest thereon, is due and unpaid; and Plaintiff avers that in and by the terms of said note, the Defendants waived all rights of exemption under the laws of the State of Alabama, and Plaintiff claims the benefit of said waiver; Plaintiff claims the additional sum of \$780.00 as a reasonable sum as attorney fees for bringing this suit for that the Defendants in and by the terms of said note agreed to pay a reasonable attorney fee, and Plaintiff avers that said amount is a reasonable attorney fee for the bringing and prosecuting of this suit.

  
ATTORNEY FOR PLAINTIFF

FILED

JUN 26 1963

ALICE L. DUCK, CLERK  
REGISTER

EX-6-25-63

Case M)

5614

BILL OF COMPLAINT

MRS. JOHN W. HULING,

Plaintiff

- vs -

M. L. BROWN and JUANITA  
T. BROWN, *III No Summit*

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Defendants reside in  
Fairhope, Alabama

Received 25 day of June 1963  
and on 25th day of June 1963  
I served a copy of the within Bill of Comp.  
on M. L. Brown &  
Juanita D. Brown  
By service on

TAYLOR WILKINS, Sheriff

By Fred Schubert

7 pages

140

Sheriff claims 20

Ten Cents per mile Total 17.00 miles at

TAYLOR WILKINS, Sheriff

BY Fred Schubert DEPUTY SHERIFF

5614

ERNEST M. BAILEY  
ATTORNEY AT LAW  
221 FAIRHOPE AVE.  
FAIRHOPE, ALABAMA

BOX 161

June 24th, 1963

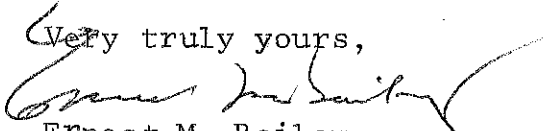
Mrs. Alice J. Duck  
Clerk of Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

Please have service made on the attached  
Bill of Complaint.

Thanking you in advance, I am

Very truly yours,

  
Ernest M. Bailey  
EMB/w