

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon STANLEY H. PARNELL 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, assignee of HOLLIS FURNITURE COMPANY.

Witness my hand, this 4th day of Dec. 1963
Alice J. Duck
Clerk

COMPLAINT

FARMERS & MERCHANTS BANK of)
Foley, Alabama, an Alabama)
Corporation, assignee of HOLLIS)
FURNITURE COMPANY)
PLAINTIFF,)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS:)

STANLEY H. PARNELL,)
DEFENDANT.)

AT LAW

5850

The Plaintiff claims of the Defendant ONE HUNDRED SEVENTY-EIGHT & 55/100 DOLLARS (\$178.55), due by promissory note-contract made by them on the 22nd day of November, 1960, and payable on July 1, 1962, with interest thereon.

Said note-contract provides for a reasonable attorney's fee, which Plaintiff alleges to be THIRTY-FIVE & 00/100 DOLLARS (\$35.00).

Willie C. Curry
Attorney for Plaintiff

The Defendant's address is:

Stanley H. Parnell
714 Oak Street
Jackson, Alabama

Please serve out of County.

Exp. 12-7-63

Executed by serving copy of within on
Stanley H. Parnell
Name
This the 7 day of Dec 1963
H. D. Paul, SE
By B. L. Justis, 1

5852

SUMMONS

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

PLAINTIFF,

VS:

STANLEY H. PARNELL,

DEFENDANT.

ceived 5 day of Dec. 1963
on _____ day of _____ 19____
rved a copy of the within A + C
Stanley H. Parnell
service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

THE SHERIFF CLAIMS 32
MILES AT 10¢ PER MILE FOR
A TOTAL OF \$ 3.20
H. D. Paul, Sheriff

STATE OF ALABAMA
CLARKE COUNTY

I, _____, certify that this bond is
signed by _____ and _____
and is a true and correct copy of the original
which is on file in the _____ County of
Alabama.

Clarke County, Ala.

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

MOTION FOR JUDGMENT BY DEFAULT

STATE OF ALABAMA

IN THE

Circuit

COURT

Baldwin COUNTY

CASE No. _____

Foremost Merchants Bank Bldg, PLAINTIFF

VS

Stanley H. Posnell, DEFENDANT

Comes now the Plaintiff in the above styled cause and moves the court to enter a default judgment against the Defendant upon writ of inquiry, and assigns the following grounds:

1. Summons and complaint were personally served upon the Defendant on the 7th day of

December, 1963

2. The Defendant has failed to appear, demur, plead, or answer the said summons and complaint and has wholly defaulted.

3. More than thirty days has lapsed since said service.

Julius Blum
Attorney

AMOUNT OF JUDGMENT \$

220⁰⁰

ATTORNEY'S FEE \$

35⁰⁰

INTEREST \$

—

TOTAL \$

255⁰⁰