

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Charles C. Lindsey to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of Newport Minette Federal Credit Union.

Witness my hand this the 5 day of ^{February}~~January~~, 1964.

Oliver S. Duck
Clerk

NEWPORT MINETTE FEDERAL
CREDIT UNION,

Plaintiff,

vs.

CHARLES C. LINDSEY,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

COUNT ONE

AT LAW

5918

The Plaintiff claims of the Defendant Two Hundred Forty-one Dollars and Sixteen Cents (\$241.16) due by promissory note made by him on the 13th day of April, 1960, and payable on the 13th day of August, 1961, with interest thereon.

The Plaintiff further alleges that in and by the terms of said promissory note the Defendant agreed to pay all costs of collections, whether incurred by suit or otherwise, including an attorney's fee equal to twenty percent (20%) of the principal and interest due on this note, and the Plaintiff claims of the Defendant the further and additional sum of Forty-eight Dollars

(\$48.00) as such reasonable attorney's fee.

The Plaintiff further alleges that the Defendant, in and by the terms of said promissory note, waived and renounced for himself any and all homestead and exemption rights under or by virtue of the Constitution or laws of Alabama as against this debt or any renewal thereof, and the Plaintiff claims the benefit of such waiver.

Respectfully submitted,

CHASON, STONE & CHASON

By: 

Attorneys for Plaintiff

FILED

FEB 5 1964

ALICE J. DUCK, CLERK
REGISTER

64-2-15-64

SUMMONS AND COMPLAINT

NEWPORT MINETTE FEDERAL CREDIT
UNION,

Plaintiff,

vs.

CHARLES C. LINDSEY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

FEB 5 1964

ALICE J. DUCK, CLERK
REGISTER

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

Received 5 day of Feb 1964
and on 15 day of Feb 1964
I served a copy of the within 200
on Charles C. Lindsey
By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Albert D. S.

Bromley

Sheriff claims 30 miles at

Ten Cent per mile Total 3.00

TAYLOR WILKINS, Sheriff

BY Albert
DEPUTY SHERIFF