

IN THE CIRCUIT COURT OF

Plaintiff,

vs.

LOWELL D. POWELL,

Defendant.

BALDWIN COUNTY, ALABAMA

LAW SIDE

No. 6122

The Plaintiff claims of the Defendant, the sum of ONE HUNDRED DOLLARS (\$100.00), the balance due by promissory note made by him on June 23, 1959, and payable in monthly installments of \$10.00 each, commencing the 23rd day of July, 1959. Plaintiff further alleges that in and by the terms of said note the failure to pay any installment accelerated the balance due under said note and that said note is delinquent since July 23, 1959, together with interest thereon from date at the rate of six percent (6%) per annum.

Plaintiff further alleges that in and by the terms of said note, the Defendant waived all rights of homestead under the Laws of the State of Alabama, and Plaintiff claims the benefit of said waiver.

Plaintiff further alleges that in and by the terms of said note the Defendant agreed to pay all costs of collection, including a reasonable attorney's fee, and Plaintiff claims the further and additional sum of Twenty-five Dollars (\$25.00) as a reasonable attorney's fee in the premises.

MASHBURN AND OWENS

By:

Attorneys for Plaintiff.

FILED

JUL 23 1964

CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

Circuit Court, Baldwin County

STATE OF ALABAMA
BALDWIN COUNTY

No.....

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

LOWELL D. POWELL

ROUTE 1, BOX 13-C

ROBERTSDALE, ALABAMA

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, State of Alabama, at Bay Minette, against.....

.....Lowell D. Powell....., Defendant.....

by
.....Mason Plan Company, Inc., a corporation..... Plaintiff.....

Witness my hand this 23rd day of July 19.64

.....*W. J. Duck*..... Clerk

Ex-7-24-64

No. 6122

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MASON PLAN COMPANY, INC.,

a corporation

Plaintiffs

vs.

LOWELL D. POWELL

Defendants

SUMMONS AND COMPLAINT

Filed July 23, 1964 19.....

Ariss J. Leach Clerk

Markburn S. Owens

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

7/23 1964

....., Sheriff

I have executed this summons

this July 23 19.....

by leaving a copy with

Lowell D. Powell

Sheriff claims 50 miles

Total 5.00

TAYLOR WILKINS, Sheriff

BY [Signature] DEPUTY SHERIFF

[Signature] Sheriff

[Signature] Deputy Sheriff

[Signature]