

FIRST NATIONAL BANK OF BAY
MINETTE, a National Banking
Association,

Plaintiff,

vs.

W. J. PORTER,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

6124

COUNT ONE:

The Plaintiff claims of the Defendant, the sum of FOUR HUNDRED SIX AND 20/100 DOLLARS (\$406.20), the balance due by promissory note made by him on February 23, 1963, and payable on February 25, 1964, with interest thereon from February 25, 1964, at the rate of eight percent (8%) 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 Seventy-five Dollars (\$75.00) as a reasonable attorney's fee in the premises.

COUNT TWO:

The Plaintiff claims of the Defendant, the sum of ONE HUNDRED FIVE AND 75/100 DOLLARS (\$105.75), the balance due by promissory note made by him on April 8, 1963, and payable on April 8, 1964, with interest thereon from April 8, 1964, at the rate of eight percent (8%) 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: *James Owens Jr.*

Attorneys for Plaintiff.

FILED
JUL 23 1964
ALICE I. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

W. J. PORTER

2700 HAND AVENUE

BAY MINETTE, 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..... W. J. Porter
....., Defendant.....

by First National Bank of Bay Minette, a National Banking
Association, Plaintiff.....

Witness my hand this..... 23rd July 64
..... day of..... 19.....

..... Clerk

84-7-25-64

No. 6124

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

FIRST NATIONAL BANK OF BAY
MINETTE, a National Banking
Association,

Plaintiffs

vs.

W. J. PORTER

Defendants

SUMMONS AND COMPLAINT

Filed July 23, 1964 19.....

W. J. Porter Clerk

Maxburn Owens
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

7/23 1964

..... Sheriff

I have executed this summons

this July 25 1964

by leaving a copy with

W. J. Porter

Taylor Watkins Sheriff

W. A. Zeller Deputy Sheriff

over