

BROOKLEY FEDERAL CREDIT
UNION, a Corporation,

Plaintiff,

VS

JIM D. BROWN,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO.

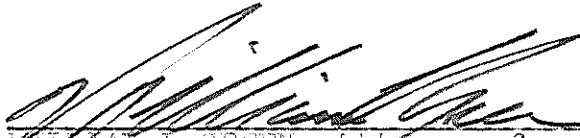
62-76

COUNT ONE

The Plaintiff claims of the Defendant the sum of
THREE HUNDRED NINETEEN AND 95/100 (\$319.95) DOLLARS, due from him
by promissory note made by him on, to-wit: the 9th day of July,
1962, and payable on, to-wit: the 31st day of January, 1963, with
interest thereon.

In said note, Defendant waived all right of exemption
under the Constitution and Laws of the State of Alabama and agreed
to pay a reasonable Attorney's fee and Plaintiff claims the benefit
of such waiver and such fee.

WHEREFORE, Plaintiff claims Judgment for said sum,
with the interest thereon.


WILLIAM L. GREEN, Attorney for the
Plaintiff

ADDRESS OF THE DEFENDANT:

Box 1592
Foley, Alabama

62-12-16-64

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6276

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Jim D. Brown

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.....
Jim D. Brown....., Defendant.....

by Brookley Federal Credit Union, a corp.....
....., Plaintiff.....

Witness my hand this.....28.....day of.....October.....19 64

Deirdre J. Rush....., Clerk

No. 6276 Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

BROOKLEY FEDERAL CREDIT UNION, a corp

Plaintiffs

vs.

JIM D. BROWN

Defendants

SUMMONS AND COMPLAINT

Filed 10-28-64 19

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

10/28 1964

Sheriff

I have executed this summons

this Dec 14 1964

by leaving a copy with

Jim D. Brown

72

720

TAYLOR WILLIAMS

BY

Imperial Williams Sheriff

Deputy Sheriff

Daley

WILLIAM L. GREEN
LAWYER
904 FIRST NATIONAL BANK BLDG.
MOBILE, ALABAMA, 36602

HE 8-4638

P. O. BOX 1048 (36601)

October 27, 1964

Hon. Alice J. Duck
Clerk, Circuit Court
Baldwin County, Alabama
Bayminette, Alabama

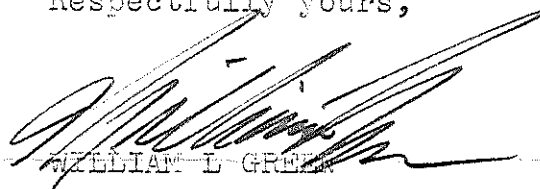
RE: Brookley Federal Credit Union

VS: Jim D. Brown

Dear Mrs. Duck:

I enclose a Complaint in the above entitled cause and ask that you file the same in your Court and, if it is convenient, advise me when it has been served and is set for trial.

Respectfully yours,



WILLIAM L. GREEN

WLG:bjg

BROOKLEY FEDERAL CREDIT
UNION, a Corporation,

Plaintiff,

VS

JIM D. BROWN,

Defendant.

IN THE CIRCUIT COURT OF

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AT LAW

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WILLIAM L. GREEN, Attorney for the
Plaintiff

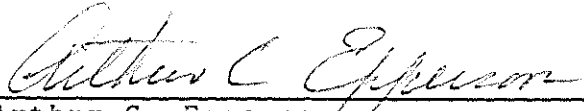
ADDRESS OF THE DEFENDANT:

Box 1592
Foley, Alabama

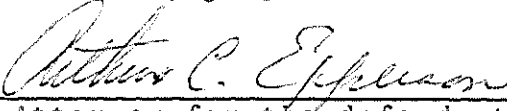
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UNION, a Corporation,	)	IN THE CIRCUIT COURT OF
	)	
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
	)	
VS.	)	AT LAW
	)	
JIM D. BROWN,	)	
Defendant	)	CASE NO. <u>6276</u>

Comes the defendant in the above entiled cause and demurs to the complaint and for grounds of demurrer assigns separately and severally the following:

1. The count is vague, indefinite and uncertain.
2. For aught that appears the interest is usurious.
3. For that aught that appears there was no consideration for the making of the note by the defendant.
4. For aught that appears the note has been paid.
5. For aught that appears there is no interest due.

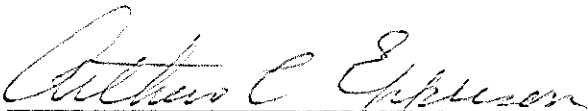

Arthur C. Epperson
 Attorney for the Defendant

The defendant demands a trial by jury.


Arthur C. Epperson
 Attorney for the defendant

Certificate of Service

I do hereby certify that I have this 23rd day of December, 1964 served a copy of the foregoing pleading on WILLIAM L. GREEN, attorney for the plaintiff in this proceeding by mailing the same Unites States mail, properly addressed and first class mail postage prepaid.


Arthur C. Epperson
 Attorney for the Defendant.

FILED
 DEC 30 1964
 JIM D. BROWN, CLERK
 REGISTER