

J. C. GRIMES

PLAINTIFF

VS

JOHN G. LONGMIRE

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6360

1.

The Plaintiff claims of the Defendant ONE THOUSAND TWENTY-EIGHT AND 03/100 DOLLARS (\$1,028.03) balance due on promissory note made by the Defendant on the 19th day of September, 1961, and payable on the 30th day of November, 1962. The Plaintiff avers that the Defendant defaulted in payment and under the provisions of the note sued on, the whole balance became due and payable. The Plaintiff claims interest at the rate of 6% per annum from July 7, 1964. The Plaintiff further avers that the Defendant agreed in the promissory note to pay all expenses including reasonable attorney's fee incurred in collecting same and the Plaintiff claims a reasonable attorney's fee in the amount of ONE HUNDRED SIXTY DOLLARS (\$160.00).

FILED

JAN 14 1965

ALICE L. DICK, CLERK
REGISTER

WILTERS, BRANTLEY & NESBITT

By:

Thurman S. Nesbitt
Attorneys for the Plaintiff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6360

J. C. GRIMES

PLAINTIFF

VS

JOHN G. LONGWIRE

DEFENDANT

WILTERS, BRANTLEY & NESBIT
Attorneys at Law
Robertsdale, Alabama

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The 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 JOHN G. LONGMIRE

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-----

JOHN G. LONGMIRE

-----, Defendant-----

by-----

J. C. GRIMES

-----, Plaintiff-----

Witness my hand this

14

day of

Jan - 1965
Alice Luck

-----, Clerk

EX-1-21-65

No. 6360

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

J. C. GRIMES

Plaintiffs

vs.

JOHN G. LONGMIRE

Defendants

Summons and Complaint

Filed

FILED

19____

JAN 14 1965

Clerk

ALICE J. DUCK

CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rural Daphne, Alabama

Received In Office

19____

_____, Sheriff

I have executed this summons

this 1-21-1965

by leaving a copy with

John C. LongmireJohn C. Longmire
Daphne

Sheriff claim

54

Ten Cents per mile

5.40Ray Randall
DEPUTY SHERIFFGaylor Wilkins

Sheriff

Roy Randall

Deputy Sheriff

\$1,028.03

Robertsdale, ALA., September 19, 1961

ON THE 30th DAY OF November, 1962, AFTER DATE WITHOUT GRACE, I ~~WE/OR/EITHER/OF/US~~
PROMISE TO PAY TO THE ORDER OF J. C. Grimes, of Loxley, Alabama

One Thousand Twenty-eight and 03/100 - - - - - DOLLARS.

for value received, in lawful money of the United States of America at its present value: with interest thereon
from September 19, 1961 at the rate of 6% per cent per annum until paid.

PAYABLE AT Office of Wilters, Brantley and Nesbit, Attorneys

The parties to this instrument, whether maker, endorser, surety, or guarantor, each for himself, hereby severally waive as to this debt, or any renewal thereof, all rights of exemption under the Constitution and Laws of Alabama, as to personal property, and they each severally agree to pay all costs of collecting or securing or attempting to collect or secure this note, including a reasonable attorney's fee, whether the same be collected or secured by suit or otherwise. And the maker, endorser, surety or guarantor of this note severally waives demand, presentment, protest, notice of protest, suit and all other requirements necessary to hold them and they agree that time of payment may be extended without notice to them of such extension. The bank at which this note is payable is hereby authorized to apply on or after maturity to the payment of this debt any funds in said bank belonging to the maker, surety, endorser, guarantor, or any one of them.

Witness my hand and seal on this the day and year, first above written.

Attest:

Phyllis S. Nesbit

Attest:

Paula Biles

John J. Langston (Seal)

(Seal)

(Seal)

No

Due

BOOK 373 PAGE 451

12-63
-62 pd Int 62.00 # Run 1,028.03
7-63 pd Int. 45.00

STATE OF ALABAMA,
BALDWIN COUNTY

I certify that this instrument was filed
and the following tax collected on

SEP 21 1961 10 AM

Deed \$ Mort. \$ 1.65 Recorded in 114
Book 273
Page 451 W B Brantley
Judge of Probate
By ace

M. - 1.65

R - .45

ers Brantley 2.10
shil
bertsdale, ala.