

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6630

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Carl E. Mullins

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.....

CARL E. MULLINS

....., Defendant.....

by ASSOCIATES DISCOUNT CORPORATION, A CORPORATION,

..... Plaintiff.....

Witness my hand this 5TH day of August 19 65

Alice J. Huerk Clerk

ASSOCIATES DISCOUNT CORPORATION, : IN THE CIRCUIT COURT OF  
a corporation,

Plaintiff, : BALDWIN COUNTY, ALABAMA.

VS. :

CARL E. MULLINS, :

Defendant. :

CASE NO. 6630

COUNT ONE

Plaintiff claims of the Defendant the sum of TWO THOUSAND ONE HUNDRED THIRTY-ONE AND 50/100 (\$2,131.50) DOLLARS, due from him under a written instrument entered into by the Defendant, on, to-wit, the 6th day of October, 1961, by which he promised to pay to Talton A. Turner, the sum of \$198.15 beginning on October 15th, 1961 and the sum of \$198.15 on the said day of each succeeding month thereafter until the sum of, to-wit, \$8,520.45 had been paid for the purchase of one (1) used American Tandem Aluminum 1959 Semi-trailer, Model No. A-110, Serial No. 10259. Plaintiff avers that said written instrument, together with all rights thereunder, was assigned to it in writing by said Talton A. Turner, before default in said written instrument, for which a valuable consideration has been paid.

Plaintiff alleges that Defendant defaulted in said written instrument, in that he failed to make the payments provided for therein, leaving a balance due of, to-wit, the sum of \$2,131.50, which sum of money, together with interest thereon, is still due and unpaid.

Plaintiff further avers and alleges that in and according to the terms of said instrument the Defendant agreed to pay attorney's fees, in the event of non-payment thereunder, and Plaintiff further avers and alleges that the sum of \$426.00 is a reasonable attorney's fee permitted by law, as is provided for in said written instrument.

COUNT TWO

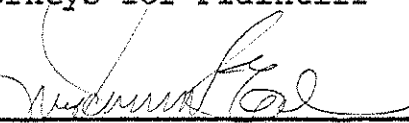
Plaintiff claims of the Defendant the sum of TWO THOUSAND ONE HUNDRED THIRTY-ONE AND 50/100 (\$2,131.50) DOLLARS, due by promissory note made by him on the 6th day of October, 1961 and payable to Talton A. Turner, in equal monthly installments commencing on the 15th day of October, 1961, and continuing on the same day of each succeeding month thereafter until paid. Plaintiff avers that said note together with all rights thereunder was assigned to it in writing by said Talton A. Turner, before default in said note, for which a valuable consideration has been paid.

Plaintiff avers that in accordance with the terms of the said note, said Defendant agreed to pay a sum equal to twenty-five (25%) percent of the total amount due in the event said note is placed in the hands of an attorney for collection, and Plaintiff further claims of the Defendant the additional sum of \$552.00 as attorney fees as provided for in said written instrument.

COUNT THREE

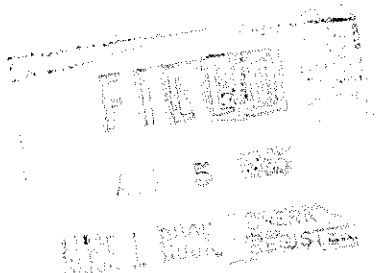
The Plaintiff claims of the Defendant the following personal property, viz: One (1) 1959 used American Tandem Aluminum Semi-trailer, Model No. A-110, Serial No. 10259, with the value or the hire or use thereof during the detention thereof, viz: from the 10th day of November, 1964.

ENGEL AND SMITH  
Attorneys for Plaintiff

BY:   
(Member Appearing)

Please serve the Defendant  
at the following address:

1615 Brewton Road  
Robertsdale, Alabama



ASSOCIATES DISCOUNT CORPORATION, : IN THE CIRCUIT COURT OF  
a corporation,

Plaintiff, : BALDWIN COUNTY, ALABAMA.

VS. :

CARL E. MULLINS, :

Defendant. : CASE NO. 6630

COUNT ONE

Plaintiff claims of the Defendant the sum of TWO THOUSAND ONE HUNDRED THIRTY-ONE AND 50/100 (\$2,131.50) DOLLARS, due from him under a written instrument entered into by the Defendant, on, to-wit, the 6th day of October, 1961, by which he promised to pay to Talton A. Turner, the sum of \$198.15 beginning on October 15th, 1961 and the sum of \$198.15 on the said day of each succeeding month thereafter until the sum of, to-wit, \$8,520.45 had been paid for the purchase of one (1) used American Tandem Aluminum 1959 Semi-trailer, Model No. A-110, Serial No. 10259. Plaintiff avers that said written instrument, together with all rights thereunder, was assigned to it in writing by said Talton A. Turner, before default in said written instrument, for which a valuable consideration has been paid.

Plaintiff alleges that Defendant defaulted in said written instrument, in that he failed to make the payments provided for therein, leaving a balance due of, to-wit, the sum of \$2,131.50, which sum of money, together with interest thereon, is still due and unpaid.

Plaintiff further avers and alleges that in and according to the terms of said instrument the Defendant agreed to pay attorney's fees, in the event of non-payment thereunder, and Plaintiff further avers and alleges that the sum of \$426.00 is a reasonable attorney's fee permitted by law, as is provided for in said written instrument.

COUNT TWO

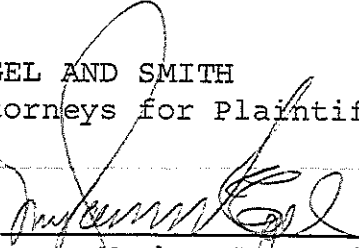
Plaintiff claims of the Defendant the sum of TWO THOUSAND ONE HUNDRED THIRTY-ONE AND 50/100 (\$2,131.50) DOLLARS, due by promissory note made by him on the 6th day of October, 1961 and payable to Talton A. Turner, in equal monthly installments commencing on the 15th day of October, 1961, and continuing on the same day of each succeeding month thereafter until paid. Plaintiff avers that said note together with all rights thereunder was assigned to it in writing by said Talton A. Turner, before default in said note, for which a valuable consideration has been paid.

Plaintiff avers that in accordance with the terms of the said note, said Defendant agreed to pay a sum equal to twenty-five (25%) percent of the total amount due in the event said note is placed in the hands of an attorney for collection, and Plaintiff further claims of the Defendant the additional sum of \$532.00 as attorney fees as provided for in said written instrument.

COUNT THREE

The Plaintiff claims of the Defendant the following personal property, viz: One (1) 1959 used American Tandem Aluminum Semi-trailer, Model No. A-110, Serial No. 10259, with the value or the hire or use thereof during the detention thereof, viz: from the 10th day of November, 1964.

ENGEL AND SMITH  
Attorneys for Plaintiff

BY:   
Member Appearing

Please serve the Defendant  
at the following address:

1615 Brewton Road  
Robertsdale, Alabama

FILED  
OCT 5 1965  
ALBANY, ALA.

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

Circuit Court, Baldwin County

STATE OF ALABAMA  
BALDWIN COUNTY

No. 6630

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Carla E. Mullins

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.....

CARL E. MULLINS, Defendant.....

by ASSOCIATES DISCOUNT CORPORATION, A CORPORATION.....

Plaintiff.....

Witness my hand this 5TH day of August 1965

N.F.

Alice S. Luck Clerk

No. 6630

Page.....

## STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ASSOCIATES DISCOUNT CORPORATION,  
A Corporation                                  Plaintiffs

vs.

CARL E. MULLINS

## Defendants

## SUMMONS AND COMPLAINT

Filed ..... August 5, ..... 1965....

Alice J. Duck Clerk

Engel & Smith- P.O. Box 1045  
Mobile, Alabama Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED  
Received In Office

Aug 5 1965 19

TAYLOR WILKINS..... Sheriff

I have executed ~~SEVEN~~ this summons

this ..... 19.....

by leaving a copy with [redacted]

10/1/1961

*Handwritten signature*

..... Sheriff

..... Deputy Sheriff

ENGEL AND SMITH

ATTORNEYS AT LAW

MOBILE-PRICHARD

MYLAN R. ENGEL  
FRED F. SMITH, JR.  
LEO A. SMITH, JR.

SUITE 910 VAN ANTWERP BLDG.  
P. O. BOX 1045  
MOBILE, ALABAMA 36601  
TEL. AC 205 438-3625  
  
111 ELLIS AVENUE  
P. O. BOX 10622  
PRICHARD, ALABAMA 36610  
TEL. AC 205 457-9579

January 27th, 1966

Mrs. Alice J. Duck  
Clerk, Circuit Court  
County Courthouse  
Bay Minette, Alabama


RE: Associates Discount Corporation  
vs. Carl E. Mullins - Case No.  
6630

Dear Mrs. Duck:

Please enter a voluntary non-suit in the above styled  
cause at the request of the Plaintiff herein. Forward  
the cost bill to this office for payment.

Yours very truly,

ENGEL AND SMITH



Mylan R. Engel

MRE/jeg