

JAMES T. GOMILLION,	*	IN THE CIRCUIT COURT OF
	*	
Plaintiff,	*	
	*	BALDWIN COUNTY, ALABAMA
	*	
VS:	*	
	*	AT LAW
JOHN L. BIGGS,	*	
	*	
Defendant.	*	CASE NUMBER <u>6639</u>

COUNT ONE


The Plaintiff claims of the Defendant, the sum of ONE THOUSAND SIXTY-FOUR AND 81/100 (\$1,064.81) DOLLARS, due from him for money loaned by Brookley Federal Credit Union, a Corporation, to the Defendant on, to-wit: the 12th day of November, 1963, which sum of money with the interest thereon, is still unpaid and is the property of the Plaintiff.

COUNT TWO

The Plaintiff claims of the Defendant, the sum of ONE THOUSAND SIXTY-FOUR AND 81/100 (\$1,064.81) DOLLARS, for that heretofore and on, to-wit: the 12th day of November, 1963, the Plaintiff endorsed a note made by the Defendant to Brookley Federal Credit Union, a Corporation, of Mobile, Alabama, said note dated, to-wit: the 12th day of November, 1963, and payable on, to-wit: the 11th day of May, 1965. The Defendant having failed to pay said note when it became due, said Brookley Federal Credit Union, a Corporation, required Plaintiff, as endorser thereon, to pay said note, which Plaintiff did, and Plaintiff further avers that said Brookley Federal Credit Union, a Corporation, transferred, set over and assigned to Plaintiff all of their right, title and interest in and to said note on, to-wit: the 11th day of May, 1965, and that said sum of money with the interest thereon, is now due Plaintiff by the Defendant. Plaintiff avers that by the terms of 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 which Plaintiff avers to be in the

sum of TWO HUNDRED TWELVE AND 96/100 (\$212.96) DOLLARS.

WHEREFORE, Plaintiff claims judgment against the Defendant for the total sum of ONE THOUSAND TWO HUNDRED SEVENTY-SEVEN AND 77/100 (\$1,277.77) DOLLARS, with the interest thereon.


WILLIAM L GREEN, Attorney for
the Plaintiff

Address of Defendant:

501 East Second Street
Bay Minette, Alabama

FILED
AUG 17 1965
CLERK
BAY MINETTE

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6639

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon John L. Biggs

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 L. Biggs....., Defendant.....

by James T. Gomillion.....
....., Plaintiff.....

Witness my hand this.....17.....day of.....August.....19..65

N.F.

Archie Duck....., Clerk

No. 6639

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JAMES T. GOMILLION

Plaintiffs

vs.

JOHN L. BIGGS

Defendants

SUMMONS AND COMPLAINT

Filed 8-17 19...65

..... Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

AUG 17 1965

19.....

TAYLOR WILKINS

SHERIFF

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Returned 17 day of Aug 1965

Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff

By W. A. Talbert
Deputy Sheriff

Last address
across the line
in Florida
out from Alabama

Sheriff

Deputy Sheriff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6639

TERM, 19

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John L. Biggs

Defendant

by James T. Gomillion

Plaintiff

Witness my hand this 17 day of August 19 65

Alfred J. Smith Clerk

JAMES T. GOMILLION,

Plaintiff,

VS:

JOHN L. BIGGS,

Defendant.

*
*
*
*
*
*
*
*
*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NUMBER 6639

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WILLIAM L. GREEN, Attorney for
the Plaintiff

Address of Defendant:

501 East Second Street
Bay Minette, Alabama

FILED

AUG 24 - 1965

CLERK
RECEIVED