

A. S. I. FEDERAL CREDIT UNION, ) IN THE CIRCUIT COURT OF  
a Corporation, )  
Plaintiff ) BALDWIN COUNTY, ALABAMA  
vs. ) AT LAW  
LUTHER M. BARNHILL, )  
Defendant. ) CASE NO. 6690

BILL OF COMPLAINT

Count One

The plaintiff claims of the defendant One Hundred Three and 88/100 (\$103.88) Dollars due by promissory note made by him on the 4th day of February, 1963, and payable on the 3rd day of May, 1963, together with the interest thereon.

Count Two

The plaintiff claims of the defendant the sum of Seventy Five and 00/100 (\$75.00) Dollars as damages for that the promissory note described in Count One of this Complaint provides for the payment of a reasonable attorney's fee in the event said defendant defaults on the payment of any installment of said note, and the plaintiff avers that prior to the filing of this suit, the defendant was and is in default on said promissory note, and on account of said default plaintiff placed said note in the hands of its counsel for collection, and plaintiff avers that the sum of Seventy Five and 00/100 (\$75.00) Dollars claimed herein as damages is a reasonable attorney's fee for the services of plaintiff's attorney, wherefore, plaintiff claims said sum in addition to the relief and damages sought and claimed in Count One hereof.

FILED

SEP 14 1965

CHASON, STONE & CHASON

By: 

INGE, TWITTY, DUFFY & PRINCE

By: 

Defendant may be served in Perdido, Alabama, his Post Office Box being 184, Perdido, Alabama.

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6690

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Luther M. Barnhill

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

Luther M. Barnhill

Defendant

by A.S.I. FEDERAL CREDIT UNION, A Corporation

Plaintiff

Witness my hand this 14th day of September 1965

Alice J. Duck, Clerk

9-23-65

EVOL

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No. 6690

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STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

A.S.I. FEDERAL CREDIT UNION,

A Corporation

Plaintiffs

vs.

LUTHER M. BARNHILL

Defendants

SUMMONS AND COMPLAINT

Filed September 14, 1965

Alice J. Duck Clerk

Chason, Stone & Chason

Inge, Twitty, Duff Plaintiff's Attorney  
& Prince

Defendant's Attorney

Defendant lives at

RECEIVED  
Received In Office

SEP 14 1965 19.....

TAYLOR WILKINS, Sheriff  
SHERIFF

I have executed this summons

this Sept 23 1965

by leaving a copy with

Luther Barnhill

Sheriff claims 26 miles at

Ten Cents per mile Total \$ 2.60

TAYLOR WILKINS, Sheriff

BY W A Gilbert  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W A Gilbert Deputy Sheriff

Perchoke